

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF ePLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER  
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND  
REVISED SUMMARY OF THE DEPOSITION OF LYNN S. CIMINO**

Plaintiff, *ePlus*, Inc. (“*ePlus*”), through counsel, hereby submits the following specific objections to Defendant Lawson Software, Inc. (“Lawson”)’s Counter-Deposition Designations of the deposition of Lynn Cimino and offers the following counter-counter designations and revised summary:

**Specific Objections**

<b>Defendant's Counter Designations</b>	<b><i>ePlus's Objections to Defendant's Counter Designations</i></b>	<b><i>ePlus's Counter-Counter Designations</i></b>
14:9-11		
29:1-3		29:8-14
29:15-19		
30:5-9	602	
33:17-18		
34:9-22		
45:5-18	602	
62:5-8		
73:15-20		

<b>Defendant's Counter Designations</b>	<b>ePlus's Objections to Defendant's Counter Designations</b>	<b>ePlus's Counter-Counter Designations</b>
84:8-12	602	
153:3-16	602	
154:10-22	602	

### **Revised Summary**

Designated testimony relates to:

Ms. Cimino is the Financial Services Manager at South Jersey Healthcare System (“SJHS”). (15:17-19) Her responsibilities include managing all of the non-clinical financial systems for the hospital. (15:20-16:2)

SJHS currently licenses the Inventory Control, Requisitions, Purchase Order, and EDI modules and Requisitions Self-Service application from Lawson. (13:7-11; 13:21-14:8) SJHS intends to do away with paper requisitions and create electronic requisitions using Requisitions Self-Service once it is implemented. (68:3-8)

The current Lawson S3 system used by SJHS was implemented between June and November of 2008. (23:14-21) Lawson provided onsite consultants at SJHS that assisted with the implementation of the system. (23:22-25) One of the consultants, Henry Reinhard, was a dedicated materials analyst that provided training on the functionality of the system. (24:15-25:8) He also helped with the data conversion for the Item Master. *Id.* SJHS obtained PDF versions of Lawson user manuals from Lawson, including user guides for the Inventory Control, Requisitions, and Purchase Order modules as well as the Requisitions Self-Service application. (12:3-13:1)

The Lawson S3 system item master at SJHS include gloves, gowns, masks, lotion, toothpaste, diapers, computer paper, and other equipment. (20:10-23) Some of the larger vendors for SJHS include Owens & Minor, Cardinal, and Medline. (22:2-10) Information found in the Item Master at SJHS includes item numbers, vendor information, units of measure, whether an item is a stock or non-stock item, item descriptions, and vendor part numbers but not item images. (18:25-19:6; 60:20-61:4; 61:16-62:4)

The information in SJHS’s Item Master was initially uploaded using Microsoft add-ins but is not manually keyed in. (19:7-11) Lawson was not primarily responsible for importing the information through the add-ins, but provided onsite training to SJHS on using the Microsoft add-ins to upload data onto the Item Master. (19:12-20:9) The responsibility for Item Master management, which includes putting items into the Item Master and deleting items from the Item Master, was shared between Lawson and SJHS, but was ultimately SJHS’s.<sup>1</sup> (39:23-40:19) Lawson also shared responsibility with SJHS for the implementation of system functionality for the requisition of goods and services and was responsible for assisting SJHS with the data migration and conversion. (40:20-42:1) Lawson assisted SJHS in formatting, error checking, and running the APIs as part of the data conversion process. (43:20-24) Lawson provided work sessions on data migration. (44:16-45:4) The data conversion was verified and validated jointly by Lawson and SJHS. (45:25-46:9)

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<sup>1</sup> Lawson contends that the sentence should read, “The responsibility for Item Master management . . . was ultimately SJHS’s.” ePlus objects that this sentence disregards the witness’s testimony that the responsibility was shared between SJHS and Lawson.

The Lawson S3 system licensed by SJHS includes the functionality to search for items by item number, item description, universal product code, and manufacturer code. (30:10-14; 128:10-129:25) It also includes the capability of automatically generating multiple purchase orders for non-stock items from a single requisition. (57:8-13; 124:1-12) A single item in the Item Master can be set up to be ordered from two different vendors. (73:21-74:15; 75:4-76:3) A requisition could be created for the item from either vendor. *Id.*

Lawson has a maintenance agreement with SJHS that covers support of the applications, including access to Lawson's knowledge base and the ability to enter support tickets. (33:1-6) The license for the Lawson S3 software is paid for on an annual basis. (35:17-36:3) SJHS is only permitted to modify the Lawson software to the extent permitted under an order form or as described in the product documentation. (80:5-81:11)

Ms. Cimino provided a recorded demonstration of the Lawson S3 software used at SJHS. (90:8-100:10; 101:15-105:12; 106:17-108:19; 112:4-116:3; 125:15-132:4; 132:6-134:8; 134:17-21; 135:9-16; 135:21-138:2; 142:5-23; 153:17-154:4; 155:4-12) Ms. Cimino demonstrated searching for items from different manufacturers (e.g., copier paper, gloves, lotion, diapers, gowns) and building requisitions for those items using the "search catalog" feature in Requisitions Self-Service as well as the RQ10 program in the Requisitions module. *Id.* Within the RQ10 program, Ms. Cimino demonstrated how to search for items by item description and manufacturer code. *Id.*

Respectfully submitted,

/s/

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Dated: August 11, 2010

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1  IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division ----- ePLUS INC., ) Civil Action Plaintiff, ) No. 3:09-CV-620 (JRS) vs. ) LAWSON SOFTWARE, INC., ) Defendant. ) -----  Videotaped Deposition of LYNN S. CIMINO Bridgeton, New Jersey Tuesday, March 2, 2010 9:58 a.m.  Job No.: 24-174475 Pages: 1 - 158 Reported by: Elizabeth M. Kondor, CCR, CLR	3  APPEARANCES ON BEHALF OF PLAINTIFF: MICHAEL STRAPP, ESQUIRE -and- JAMES D. CLEMENTS, ESQUIRE Goodwin Procter, LLP 53 State Street Exchange Place Boston, Massachusetts 02109 (617) 570-1000  ON BEHALF OF DEFENDANT: JOSHUA P. GRAHAM, ESQUIRE Merchant & Gould, P.C. 3200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402-2215 (612) 332-5300  ON BEHALF OF THE WITNESS AND SOUTH JERSEY HEALTHCARE: MIKOLE BURKE-ANDERSON, ESQUIRE 2950 College Drive - Suite 1E Vineland, New Jersey 08360 (856) 641-8632  ALSO PRESENT: MIKE CILIBERTI, Video Specialist
2	1  VIDEOTAPED DEPOSITION OF LYNN S. CIMINO  Held in the offices of: Department of Human Resources South Jersey Healthcare 333 Irving Avenue Bridgeton, New Jersey  Taken pursuant to Federal Rules of Civil Procedure, before Elizabeth M. Kondor, CCR, CLR and Notary Public in and for the State of New Jersey, who officiated in administering the oath to the witness.	4  EXAMINATION INDEX  WITNESS PAGE LYNN S. CIMINO Examination by Mr. Strapp.....7 Examination by Mr. Graham.....141 Further Examination by Mr. Strapp.....152 Further Examination by Mr. Graham.....154  EXHIBIT INDEX (Exhibits attached.) EXHIBIT DESCRIPTION PAGE South Jersey 1 Subpoena for Production of Documents.....9 South Jersey 2 Subpoena to Testify at a deposition.....9 South Jersey 3 Document entitled "Instructions".....9 South Jersey 4 Document entitled "Lawson Professional Services Statement of Work for South Jersey Health System, Inc." (SJH000002 - 84).....36

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 EXHIBITS CONTINUED</p> <p>2 EXHIBIT DESCRIPTION PAGE</p> <p>3 South Jersey 5 Informal RFP Requests</p> <p>4 and Lawson's Response</p> <p>5 (SJH000115 - 141).....51</p> <p>6 South Jersey 6 Inventory Control User</p> <p>7 Guide Version 9.0.1</p> <p>8 (L0032249 - 549).....70</p> <p>9 South Jersey 7 Purchase Order User</p> <p>10 Guide Version 9.0.1</p> <p>11 (L0052019 - 296).....72</p> <p>12 South Jersey 8 Product order forms</p> <p>13 and Master Terms and</p> <p>14 Conditions Agreement</p> <p>15 with Lawson</p> <p>16 (SJH000099 - 114).....78</p> <p>17 South Jersey 9 Follow-on Proposal from</p> <p>18 Lawson in response to</p> <p>19 the RFP</p> <p>20 (SJH000142 - 191).....81</p> <p>21 South Jersey 10 Lawson Requisitions</p> <p>22 Self-Service User Guide</p> <p>23 Version 9.0.1</p> <p>24 (L0045474 - 553).....84</p> <p>25 South Jersey 11 Recording of Demonstration...155</p>	<p>5</p> <p>1 L Y N N S. C I M I N O, having been first duly 2 sworn, testified as follows:</p> <p>3 EXAMINATION BY MR. STRAPP:</p> <p>4 Q. Good morning, Ms. Cimino.</p> <p>5 A. Good morning.</p> <p>6 Q. Have you ever had a deposition taken 7 before?</p> <p>8 A. No.</p> <p>9 Q. Today I'm going to be asking you 10 questions and you will provide answers. If 11 there's ever an instance where you don't 12 understand my question, can you please let me 13 know?</p> <p>14 A. Yes.</p> <p>15 Q. And if you answer my question, I'll 16 assume that you understood it; is that fair?</p> <p>17 A. Yes.</p> <p>18 Q. The court reporter is going to be 19 taking down our questions and answers today on a 20 written transcript, so you'll need to answer 21 audibly to my questions.</p> <p>22 Does that make sense?</p> <p>23 A. Yes.</p> <p>24 Q. How did you prepare for this 25 deposition today?</p>
<p>1 VIDEOGRAPHER: Here begins Videotape 2 No. 1 in the deposition of Lynn Cimino in the 3 matter of ePlus, Incorporated versus Lawson 4 Software, Incorporated, in the US District Court, 5 for the Eastern District of Virginia, Case No. 6 309-CV-620. Today's date is March 2, 2010 and the 7 time on the video monitor is 9:58 a.m. 8 The video operator today is Mike 9 Ciliberti, and this videotape deposition is taking 10 place at 333 Irving Avenue, Bridgeton, New Jersey. 11 Counsel, please voice identify 12 yourselves and state whom you represent. 13 MR. STRAPP: Michael Strapp, 14 representing the plaintiff, ePlus. 15 MR. CLEMENTS: James Clements, 16 representing plaintiff, ePlus. 17 MR. GRAHAM: Joshua Graham, 18 representing defendant, Lawson Software. 19 MS. BURKE-ANDERSON: Mikole 20 Burke-Anderson, associate general counsel, South 21 Jersey Healthcare. 22 VIDEOGRAPHER: Would the reporter 23 please swear in the witness. 24</p>	<p>6</p> <p>1 A. I did Google ePlus and Lawson to find 2 out what this might pertain to, and that's 3 honestly about it, because I didn't have a whole 4 lot of direction as to what may be asked of me. 5 Q. Okay. And are you being represented 6 here by Ms. Mikole Burke-Anderson? 7 A. I don't think I'm actually 8 represented by anybody. 9 MS. BURKE-ANDERSON: You are not. 10 MR. STRAPP: Okay. 11 THE WITNESS: Okay. 12 MS. BURKE-ANDERSON: As we are not a 13 party to this lawsuit. 14 THE WITNESS: Okay. 15 MR. STRAPP: Okay. 16 Q. Did you meet with Ms. Burke-Anderson 17 to prepare for the deposition? 18 A. No. 19 Q. And did you speak with Mr. Graham 20 from Merchant &amp; Gould to prepare for the 21 deposition? 22 A. No. 23 Q. Did you review any documents to 24 prepare for the deposition? 25 A. I provided documents to Mikole based</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1       on her request.</p> <p>2       Q.     Okay. And how did you go about</p> <p>3       collecting those documents for Mikole?</p> <p>4       A.     They're documents that I had when we</p> <p>5       signed the contracts with Lawson Software, so they</p> <p>6       were items that I already had.</p> <p>7       Q.     And did you collect those documents</p> <p>8       based on her direction about what the subpoena was</p> <p>9       requesting?</p> <p>10      A.     No. I had those documents as part of</p> <p>11      our signing with Lawson.</p> <p>12      MR. STRAPP: Can I mark these as</p> <p>13      Exhibits South Jersey 1 through South Jersey 3,</p> <p>14      please.</p> <p>15      (Exhibits South Jersey 1 through</p> <p>16      South Jersey 3 were received and marked for</p> <p>17      identification.)</p> <p>18      Q.     Do you understand that the testimony</p> <p>19      that you're going to be providing today here is</p> <p>20      under oath testimony?</p> <p>21      A.     Yes.</p> <p>22      Q.     And is there anything that would</p> <p>23      prevent you today from giving full, complete and</p> <p>24      honest answers to my questions?</p> <p>25      A.     No.</p>	<p>9</p> <p>1       are a list of 11 topics there for the deposition.</p> <p>2       If you could take a moment to review</p> <p>3       them and let me know if there are any topics that</p> <p>4       you're not prepared to testify about today?</p> <p>5       A.     Okay.</p> <p>6       Can I get a definition of what Lawson</p> <p>7       Electronic Sourcing means to you?</p> <p>8       Q.     To me, that would refer to any of the</p> <p>9       software modules involved in the Lawson S3</p> <p>10      Software Suite?</p> <p>11      A.     Okay. Then I feel comfortable</p> <p>12      answering these questions, noting we don't have</p> <p>13      the punchout application.</p> <p>14      Q.     Okay.</p> <p>15      A.     So I can only speak to the actual</p> <p>16      modules that we do have here.</p> <p>17      Q.     Okay. Could you turn, please, now to</p> <p>18      page 12 of that document that we're looking at,</p> <p>19      Exhibit South Jersey 3, which is a schedule of</p> <p>20      topics and requests for production of documents.</p> <p>21      And my question is whether there are</p> <p>22      any documents in the possession of South Jersey</p> <p>23      that are responsive to these requests that have</p> <p>24      not yet been produced to ePlus?</p> <p>25      A.     I provided the contracts and our</p>
<p>1       Q.     The court reporter has just handed</p> <p>2       you what have been marked as South Jersey Exhibits</p> <p>3       1 through 3.</p> <p>4       Have you seen any of these documents</p> <p>5       before?</p> <p>6       A.     No.</p> <p>7       Q.     Okay. I'll represent to you that</p> <p>8       these are copies of subpoenas and schedules of</p> <p>9       instructions that were served by ePlus on South</p> <p>10      Jersey.</p> <p>11      Do you understand that you are here</p> <p>12      today representing South Jersey in response to the</p> <p>13      subpoena for deposition testimony that was served</p> <p>14      by ePlus?</p> <p>15      A.     Yes.</p> <p>16      Q.     And are you prepared today to provide</p> <p>17      testimony on behalf of South Jersey regarding the</p> <p>18      deposition topics that ePlus is seeking testimony</p> <p>19      about?</p> <p>20      A.     I believe so. I don't know what</p> <p>21      those topics are yet, but...</p> <p>22      Q.     Okay. So why don't we take a moment</p> <p>23      to look and review Exhibit South Jersey 3, which</p> <p>24      is entitled "Instructions." And if you could turn</p> <p>25      to page 10 of that document, you'll see that there</p>	<p>10</p> <p>1       software license. I did not provide any user</p> <p>2       manuals.</p> <p>3       Q.     And does South Jersey have in its</p> <p>4       possession any Lawson user manuals?</p> <p>5       A.     I have downloads of their user</p> <p>6       manuals, like, in PDF format, not printed</p> <p>7       versions.</p> <p>8       Q.     Okay. Do you know which user manuals</p> <p>9       are in PDF format that you have?</p> <p>10      A.     I have probably most of them. I have</p> <p>11      the procurement, I have the inventory control, I</p> <p>12      have the other applications, which I guess you're</p> <p>13      not really interested in, HR, accounts payable,</p> <p>14      invoice matching, that type of stuff.</p> <p>15      Q.     Do you have the Requisitions User</p> <p>16      Guide?</p> <p>17      A.     I believe so.</p> <p>18      Q.     Do you have the Inventory Control</p> <p>19      User Guide?</p> <p>20      A.     Yes.</p> <p>21      Q.     Does South Jersey have in its</p> <p>22      possession, the Purchase Order User Guide?</p> <p>23      A.     Yes.</p> <p>24      Q.     Does South Jersey have the</p> <p>25      Requisitions Self-Service User Guide?</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 A. Yes.</p> <p>2 Q. Are there any other documents that</p> <p>3 are listed in this Schedule B that South Jersey</p> <p>4 has in its possession, but that have not yet been</p> <p>5 provided to ePlus?</p> <p>6 A. I don't believe so.</p> <p>7 Q. What software does South Jersey</p> <p>8 currently license from Lawson?</p> <p>9 A. The purchase order module, the</p> <p>10 requisition self-service, inventory control,</p> <p>11 invoice matching.</p> <p>12 Q. Anything else?</p> <p>13 A. Do you want me to go through, like,</p> <p>14 the human resources applications?</p> <p>15 Q. You don't need to go through the</p> <p>16 particular module, but does South Jersey also</p> <p>17 license the Human Resources Suite?</p> <p>18 A. We do. We license -- it's fully RP,</p> <p>19 so we have the financial module, the human</p> <p>20 resource module, including payroll and benefits.</p> <p>21 Q. And what particular software</p> <p>22 applications does South Jersey license from Lawson</p> <p>23 that relate to procurement?</p> <p>24 A. The purchase order, inventory</p> <p>25 control, requisition self-service, invoice</p>	<p>13</p> <p>1 believe that was it, because I think we had the</p> <p>2 invoice matching, even though it wasn't being</p> <p>3 used, but that may be new, I'd really have to look</p> <p>4 at the software license agreement that was signed</p> <p>5 in '08 to know for sure.</p> <p>6 Q. And before South Jersey upgraded its</p> <p>7 software in April of '08, had it also already</p> <p>8 licensed older versions of purchase order from</p> <p>9 Lawson?</p> <p>10 A. Yes.</p> <p>11 Q. And was it already licensing, at that</p> <p>12 point, EDI from Lawson?</p> <p>13 A. Yes.</p> <p>14 Q. And was it already licensing</p> <p>15 inventory control from Lawson?</p> <p>16 A. Yes.</p> <p>17 Q. What is your current title at South</p> <p>18 Jersey?</p> <p>19 A. I'm the financial systems manager.</p> <p>20 Q. And what kind of responsibilities do</p> <p>21 you have in that role?</p> <p>22 A. I manage all of the financial</p> <p>23 systems, the nonclinical financial systems, for</p> <p>24 the hospital. Lawson is one major area of</p> <p>25 responsibility, in addition to Sorian for our</p>
<p>1 matching.</p> <p>2 Q. Are these -- are those software</p> <p>3 applications all part of the Lawson S3 Software</p> <p>4 Suite?</p> <p>5 A. Yes.</p> <p>6 Q. Does South Jersey license EDI from</p> <p>7 Lawson?</p> <p>8 A. Yes, we do, sorry.</p> <p>9 Q. And has South Jersey at any point in</p> <p>10 time licensed procurement punchout from Lawson?</p> <p>11 A. No.</p> <p>12 Q. When was the -- when did South Jersey</p> <p>13 first license any of the procurement software from</p> <p>14 Lawson?</p> <p>15 A. South Jersey had a very old version</p> <p>16 of Lawson that was licensed in -- honestly, I'm</p> <p>17 not positive. It's -- several years ago, we</p> <p>18 confirmed that original contract. I don't know.</p> <p>19 We recently upgraded from that version to Version</p> <p>20 9 in -- I guess April of '08 is when those</p> <p>21 contracts were signed.</p> <p>22 Q. And in April of '08, did Lawson -- I</p> <p>23 mean, did South Jersey license any new procurement</p> <p>24 modules that it did not have at that point?</p> <p>25 A. Requisition self-service, and I</p>	<p>14</p> <p>1 scheduling, our registration and our billing</p> <p>2 systems.</p> <p>3 Q. And is there -- are there any</p> <p>4 employees of South Jersey that work under your</p> <p>5 direction?</p> <p>6 A. Yes. I have five direct reports.</p> <p>7 Q. And what kind of responsibilities do</p> <p>8 those reports have?</p> <p>9 A. Two of those employees currently</p> <p>10 support Lawson, two are working on the Sorian side</p> <p>11 and one is kind of working with our electronic</p> <p>12 medical record implementation.</p> <p>13 Q. What are the names of the employees</p> <p>14 who support the Lawson Software?</p> <p>15 A. Matthew Daph and Gene Goss. Both are</p> <p>16 new employees to South Jersey Health System after</p> <p>17 the implementation of Lawson.</p> <p>18 Q. And do they have specific areas of</p> <p>19 responsibility with respect to the Lawson</p> <p>20 Software?</p> <p>21 A. Matthew primarily handles the HR</p> <p>22 payroll. Gene primarily handles the invoice</p> <p>23 matching and the procurement applications. Gene</p> <p>24 has been employed with us for two months and would</p> <p>25 not be able to speak.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Q. Are -- who is permitted at South 2 Jersey to utilize the Procurement Suite of 3 software from Lawson?</p> <p>4 A. All of our employees in the materials 5 management department have different 6 responsibilities, our buyers, our warehouse and 7 storeroom personnel, our accounts payable 8 department, with regard to invoice matching. Then 9 there's IT personnel who had access to the 10 information as well.</p> <p>11 Q. Approximately how many employees are 12 there in the materials management department at 13 South Jersey?</p> <p>14 A. There's less than 50. I could get 15 you an accurate count. I honestly don't know.</p> <p>16 Q. How long have you been working with 17 Lawson Software?</p> <p>18 A. Since April of '08.</p> <p>19 Q. And how long have you been employed 20 by South Jersey?</p> <p>21 A. Twenty years.</p> <p>22 Q. Who was responsible for the Lawson 23 Software applications at South Jersey prior to 24 April of '08?</p> <p>25 A. There was a materials analyst who</p>	<p>17</p> <p>1 in the Item Master?</p> <p>2 A. You have -- what we call the Lawson 3 number is the item number, you have the vendor 4 information, unit of measure, whether it's a stock 5 or nonstock type item, the description of the 6 item, secondary description of the item.</p> <p>7 Q. And how is that information imported 8 into the Item Master?</p> <p>9 A. Now, it's manually keyed in there. 10 Initially, we uploaded it through the Microsoft 11 add-ins.</p> <p>12 Q. Did Lawson assist in that process of 13 the importation of the information through the 14 Microsoft add-ins?</p> <p>15 A. We had consultants on site who may 16 have assisted, but we were trained in how to use 17 the add-ins, so we primarily did that ourselves.</p> <p>18 Q. And who provided South Jersey with 19 the training on how to use the add-ins; was that 20 Lawson personnel?</p> <p>21 A. Yes.</p> <p>22 Q. Were those employees of the Lawson 23 Professional Services Group?</p> <p>24 A. Yes.</p> <p>25 Q. And was that training provided on</p>
<p>1 primarily supported that, who no longer works with 2 South Jersey.</p> <p>3 Q. Are you familiar with the term Item 4 Master?</p> <p>5 A. Yes.</p> <p>6 Q. And do you know approximately how 7 many items are available in the Item Master that 8 South Jersey has on its Lawson Software?</p> <p>9 A. No. I know we did a major cleansing 10 prior to Go Live on our Version 9 and cut that 11 number down dramatically. I could find that out 12 for you, but I wouldn't want to hedge a guess.</p> <p>13 Q. Okay. Do you know whether it's more 14 or less than 10,000 items?</p> <p>15 A. Less than 10,000, I would say.</p> <p>16 Q. Would you say more or less than 5,000 17 items?</p> <p>18 A. No, I don't want to guess.</p> <p>19 Q. Okay. Do you know approximately how 20 many different vendors South Jersey uses within 21 the Lawson procurement system?</p> <p>22 A. Just procurement vendors?</p> <p>23 Q. Yes.</p> <p>24 A. No.</p> <p>25 Q. What types of item data are included</p>	<p>18</p> <p>20</p> <p>1 site at South Jersey?</p> <p>2 A. Yes.</p> <p>3 Q. Do you know approximately how long 4 the training lasted for?</p> <p>5 A. It wasn't a formal training class. 6 We had the consultants on site, so it was kind of 7 more like a work session as needed with different 8 things, so there were various consultants at 9 different times.</p> <p>10 Q. What type of products are available 11 in the Lawson System at South Jersey, like, for 12 example, are there surgical gloves, stents; what 13 type of items are available in the Item Master?</p> <p>14 A. There's a variety of items. There 15 are gloves, there are gowns, there's masks, 16 there's lotion, toothpaste, diapers, a lot of 17 equipment. I don't really know what it's used 18 for, but patient care related.</p> <p>19 Q. Are there also office supplies 20 available in the Item Master?</p> <p>21 A. Office supplies are not. There may 22 be some computer paper, stuff like that, nonstock 23 items, that are in there.</p> <p>24 Q. Okay. And are most of the items 25 nonstock items or are they Lawson -- are they</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1     South Jersey inventory that are available in the 2     Item Master? 3     A. I don't know a breakdown of the two. 4     I would say that there's probably more nonstock 5     items in there than inventory, but that would be a 6     guess. 7     Q. Does South Jersey maintain its own 8     inventory of items in stock? 9     A. Yes. 10    Q. And are the personnel in the 11    Materials Management Group at South Jersey 12    permitted to order nonstock items from vendors 13    using the Lawson System? 14    A. Yes. 15    Q. And do they need to receive approval 16    from manager level employees before those 17    requisitions can be approved? 18    A. The buyers themselves -- our process 19    here is, whoever is requesting it would get 20    management approval, so if I was requesting 21    something from IS, I would have my IS management 22    approval, so by the time it went to the buyer, 23    they would already have the approvals, they 24    wouldn't really be seeking any materials 25    management approval to order that item, if that</p>	<p>21</p> <p>1     A. Blue Horseshoe. 2     Q. And how long did that process of the 3     installation of the software take? 4     A. We had a test environment done in 5     production, so we had two weeks time, pretty much 6     one for each environment. 7     Q. Once the two-week period was over, 8     the system went live with the new software 9     version? 10    A. No. The system was ready for us to 11    start working with the consultants to build it, to 12    test it, to go live. 13    Q. I see. 14    A. It was implemented -- installed in 15    June of '08; we went live with materials and 16    finance November 1st of '08; HR payroll, January 17    1st of '09. 18    Q. So between June of '08 and November 19    of '08, was an implementation period after the new 20    software was installed? 21    A. Yes. 22    Q. And during that implementation period 23    were there Lawson personnel that were on site here 24    in Bridgeton, New Jersey at South Jersey? 25    A. Yes.</p>
<p>1     answers the question you're asking. 2     Q. Is it possible for you to determine 3     who the largest vendors are that -- the vendors 4     who supply the most goods in your Item Master; are 5     you aware of that information? 6     A. I would say Owens &amp; Minor is one of 7     our prime vendors. 8     Q. Okay. Any other prime vendors that 9     you can think of? 10    A. Cardinal, and perhaps Medline. 11    Q. What services did Lawson provide for 12    South Jersey when South Jersey upgraded its 13    software in April of 2008; what installation and 14    implementation services? 15    A. Lawson actually contracted with a 16    third party for the installation of the 17    applications and all of that software. Lawson 18    provided consulting services to us, which 19    consisted of training, more of a work session type 20    environment, not really formal training classes. 21    Everything was done on our facility. We didn't go 22    out to any formal Lawson training. 23    Q. Who was the third party that Lawson 24    contracted with for the installation of the 25    applications and the software?</p>	<p>22</p> <p>1     Q. And do you know approximately how 2     many Lawson personnel were here at South Jersey 3     during that period from June of '08 through 4     November of '08? 5     A. The total number of people that we 6     had or -- 7     Q. Yes, the total number. 8     A. I believe we had seven different 9     consultants that came and went through that time. 10    There was one dedicated materials analyst, one for 11    finance. It ended up being two for HR payroll, 12    because they switched. We had to bring in another 13    one to do invoice matching. And then there were 14    some assistant consultants brought in. 15    Q. Do you recall the name of the 16    dedicated materials analyst from Lawson that was 17    here during the implementation phase? 18    A. Yes. 19    Q. What was the name? 20    A. Henry Reinhard. 21    Q. And what kind of tasks was Henry 22    Reinhard performing during that implementation 23    period from June of '08 through November of '08? 24    A. He provided training on the system, 25    functionality. He helped with data conversion,</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 what we needed to do when, kind of a step by      2 step --      3 (Interruption by the court reporter.)      4 A. He provided training, the      5 functionality, how to use the system, the order in      6 which we needed to implement things, you know, how      7 stuff builds on the next. He provided staff      8 training sessions.      9 Q. And I think you mentioned data      10 conversion as well?      11 A. He didn't really do the data      12 conversion, but he would assist if there were      13 questions on how Lawson 724 now converts to Lawson      14 9. That was our upgrade, so it was a major      15 upgrade, missing one of Lawson's major releases,      16 though.      17 Q. What was involved in the process of      18 converting the data from the Lawson 724 System to      19 the Lawson 9 System with respect to the Supply      20 Chain Management Suite?      21 A. There was a cleansing of the Item      22 Master to get rid of items that were no longer      23 used. There was a vendor merging, if you will.      24 Prior to Lawson 9, we didn't have a      25 fully-integrated system, so our vendors that were</p>	<p>25</p> <p>1 involved?      2 A. Yes.      3 Q. And can you recall what was the      4 process involved for the data conversion to the      5 Item Master for the Lawson 9 software?      6 A. The Item Master that was in the      7 Lawson 724 environment was dumped out and it was      8 looked through to find the items that needed to be      9 removed. Once they were confident on what items      10 they then wanted to have in the new Lawson 9 Item      11 Master, that was uploaded via the add-ins.      12 Q. And how was Lawson involved in that      13 process of converting data for the Item Master for      14 the Lawson 9 software?      15 A. They provided assistance on field      16 values. They did not perform the conversion.      17 Q. Were there any Lawson APIs that were      18 used during that process of the data conversion?      19 A. If the add-ins used APIs, then yes.      20 Q. Okay. Now, the data that was already      21 in the Item Master from the earlier version of      22 Lawson, Lawson 724, how had that data come to be      23 in the earlier version of the Item Master?      24 A. How was it initially populated?      25 Q. Exactly.</p>
<p>1 in materials had different numbers in instances      2 from the vendors that were in our accounts payable      3 system, so since it was becoming one system, we      4 needed to merge those vendors together, so that      5 was a major undertaking. There was – whatever      6 was new to Lawson 9, that needed to be populated.      7 You know, like, we have requesting locations that      8 tie back to GL categories. All of that had to be      9 worked. All of the account numbers that items      10 would be expensing against needed to be reworked,      11 because with bringing GL onto the system as well,      12 there was a whole new chart of account structure.      13 Q. Does GL stand for general ledger?      14 A. Yes.      15 Invoice matching was a completely new      16 application for us, so all of that set-up needed      17 to be done.      18 Q. You mentioned that there was much      19 that was new to Lawson 9 that needed to be      20 populated.      21 Did that include populating the Item      22 Master of the procurement for the Procurement      23 Suite?      24 A. The Item Master wasn't new.      25 Q. Okay. Was there a data conversion</p>	<p>26</p> <p>1 A. I don't know.      2 Q. You mentioned that the Lawson      3 personnel that was on site here during the      4 implementation phase assisted with training.      5 Can you provide some specifics about      6 the type of training that was offered by Lawson      7 during that time period with respect to      8 procurement and supply chain?      9 A. They would hold work sessions. One,      10 in particular, I remember, was on vendor returns.      11 That was something that we weren't using, so they      12 kind of did a session on how it would work, what      13 we needed to do to make that process work.      14 Q. Was there training provided with      15 respect to using the search functionality within      16 the requisition self-service?      17 A. Requisition self-service is not live      18 currently, so that wasn't really worked on during      19 our initial implementation. That's a project      20 we've picked up during '09, so we really didn't      21 have the Lawson personnel on site at that time.      22 Towards the end of their, I guess,      23 contract with us for training services, Henry did      24 provide some assistance on how that would work,      25 but that work was primarily done on our own.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Q. When did South Jersey go live with 2 requisition self-service? 3 A. We have not gone live yet. 4 Q. Is there a plan in place about when 5 you expect to go live with requisition 6 self-service? 7 A. No. 8 Q. Do you know whether South Jersey 9 intends to use requisition self-service in the 10 future? 11 A. I believe, yes. And we have most of 12 the work done and ready, but then we had a 13 turn-over of staff and it just wasn't feasible to 14 really move forward with it at that time. 15 Q. Do you know whether South Jersey 16 intends to use procurement punchout in the future? 17 A. That's not something that we've ever 18 contracted with. We inquired pricing, but nothing 19 we've actually submitted for budget approval. 20 Q. Was there any training done on using 21 the search functionality within the requisitions 22 module during the implementation phase of Lawson 23 9? 24 A. To search for an item? 25 Q. Correct.</p>	<p>29</p> <p>1 that, so I'm not well-versed in that. 2 Q. Has Lawson provided you with -- has 3 Lawson provided South Jersey with training for 4 requisition self-service, even if you're not using 5 it currently? 6 A. No. 7 Q. Is there any contract with Lawson in 8 place for Lawson to provide, in the future, 9 training for requisition self-service? 10 A. No. 11 Q. Has any new data been imported into 12 the Item Master since the Lawson 9 System went 13 live in November of '08? 14 A. Imported or added? 15 Q. Added. 16 A. We've added items, yes. 17 Q. What about imported? 18 A. We have imported purchasing classes 19 against existing items, but we have not -- once 20 the initial Item Master was populated, we didn't 21 go back and reload anything during import. 22 Q. Okay. When items were added -- have 23 been added, can you explain to me what the process 24 entails of adding items to the Item Master? 25 A. Our purchasing staff actually adds</p>
<p>1 A. I mean, there was training on how to 2 use search in general. The search for the Item 3 Master is no different than a search for anything 4 else. 5 Q. Are there advanced search 6 functionalities available in the requisition 7 module that South Jersey has in place from Lawson? 8 A. No, I'm not aware of any advanced 9 search functionality. 10 Q. Do you know whether there's a search 11 by catalog functionality available? 12 A. I'm not sure what you mean by search 13 by catalog. I mean, you can search by item 14 number, by description. 15 Q. Can you search by -- are you familiar 16 with the term UNSPSC? 17 A. Yes, we don't use them. 18 Q. You don't use UNSPSC? 19 A. Correct. 20 Q. Okay. 21 A. Now, in requisition self-service, 22 maybe that's where you're getting that advanced 23 search functionality. In there, you can search by 24 description, item, that sort of stuff. Again, you 25 can set up keyword searches. But we're not using</p>	<p>30</p> <p>1 the items, so I can speak in general. They have 2 to give it a Lawson number, the description, 3 whatever the required fields are, they're going to 4 kind of assign that to a vendor. They're going to 5 put stock unit of measure, purchase unit of 6 measure, transaction unit of measure. They will 7 then link that, if it's an inventory item, to what 8 inventory location they want that item to be 9 available from. 10 Q. What about if it's a nonstock item? 11 A. If it's a nonstock item, they have to 12 put some -- well, there's GL categories either 13 way, but it's a little bit different set-up 14 depending on whether it's inventory or not. If 15 it's a nonstock item, they wouldn't have to tie 16 that to an inventory location, so it would be 17 built in just strictly Item Master, not taken to 18 the next step. 19 Q. So when items are added, it's done on 20 an item-by-item basis? 21 A. Yes. 22 Q. Does Lawson currently provide any 23 training services to South Jersey? 24 A. We're not contracted with Lawson for 25 any training services.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Q. What kind of maintenance services 2 does Lawson provide to South Jersey? 3 A. Under our maintenance agreement is 4 really just support of the applications. That 5 gives us access to their knowledge base, the 6 ability to enter support tickets. 7 Q. And do you know -- I know that Lawson 8 has different categories of maintenance service. 9 Do you know what the classification of your 10 maintenance package is? I think they call it, 11 like, gold, silver or bronze. 12 A. I believe we're at bronze. 13 Q. Okay. 14 A. We have the lowest level that's offered. 15 Q. All right. 16 A. We don't have a dedicated support rep, we don't have... 17 Q. And do you know what type of maintenance has been performed on the customer procurement system over the past couple of years? 18 A. Maintenance by who? 19 Q. By Lawson. 20 A. Lawson has provided assistance in ticket problem solving. They have not done</p>	<p>33</p> <p>1 A. Lawson provides patches that they 2 suggest we apply to the system. I have not been 3 forced to put something on to the system yet. 4 Q. And when Lawson provides these 5 patches, is it South Jersey's practice to upgrade 6 it with the patches offered by Lawson? 7 A. Only if we're experiencing the 8 problem that the patch will fix, so South Jersey 9 does not apply most of the patches that Lawson 10 provides. 11 Q. Are there any uses of the Lawson 12 Software that are prohibited by Lawson? 13 A. I would think in their contract, yes. 14 I can't disclose a lot of stuff about it. I mean, 15 we're licensing the software from Lawson. They 16 own it. 17 Q. What's the term of your license 18 agreement with Lawson for the Procurement Suite 19 and the Supply Chain Management Suite; is it a 20 yearly -- 21 A. It's a yearly maintenance. 22 Q. Okay. And are you required to renew 23 it at the end of each year for the following year? 24 A. We're -- yes. I mean, if we don't 25 pay our maintenance bill, we won't have support.</p>
<p>1 anything on the system for us. 2 Q. Is that assistance provided over the 3 phone? 4 A. It's usually through their 5 interactive web support. It can be provided over 6 the phone. They have, on occasion, connected via 7 WebEx session to actually look at the system, but 8 that's pretty rare. 9 Q. Has there been any maintenance 10 performed by someone from Lawson here live at 11 South Jersey since the Lawson 9 System went live 12 in November of '08? 13 A. Not since the week after Go Live. 14 Q. Has Lawson -- does Lawson place any 15 contractual restrictions on the ability of South 16 Jersey to modify the software that they provided? 17 A. We have an application called design 18 studio which allows us to modify screens, forms, 19 that type of thing, so in that regard, we're able 20 to make modifications, but we can't take their 21 code and, you know, make it our own and that sort 22 of thing, if that is answering your question. 23 Q. Does Lawson require South Jersey to 24 periodically update the software in case of bug 25 fixes or upgrades or other reasons?</p>	<p>34</p> <p>1 That's all I'm required to do, is pay my 2 maintenance bill. There's nothing else that I 3 need to sign or do as part of that process. 4 (Exhibit South Jersey 4 as received 5 and marked for identification.) 6 Q. The court reporter has handed you 7 what has been marked as South Jersey 4. And for 8 the record, we have -- the document is Bates 9 stamped SJH 2 through SJH 84. It is entitled 10 "Lawson Professional Services, Statement of Work 11 for South Jersey Health System, Inc." 12 Are you familiar with this document? 13 A. Yes. 14 Q. And can you describe for me what it 15 is? 16 A. This is a summary on detail of what 17 we contracted with Lawson for our implementation 18 and our Go Live with the Lawson 9 upgrade. 19 Q. And what was your role in that 20 process? 21 A. Picking through this to make it say 22 what I wanted it to say. I have intimate 23 knowledge of it. 24 Q. Okay. So you were personally 25 involved in negotiating this Statement of Work</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

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<p>1 with Lawson?</p> <p>2 A. Yes.</p> <p>3 Q. And who was your counterpart on the</p> <p>4 Lawson side that you were dealing with with</p> <p>5 respect to this document?</p> <p>6 A. Karen and -- can I look at this?</p> <p>7 Q. Sure.</p> <p>8 A. I think her name is on here.</p> <p>9 Our account executive and Karen</p> <p>10 Bruschke is primarily who it went back and forth</p> <p>11 with.</p> <p>12 Q. And how much -- what was the time</p> <p>13 period during which you were negotiating this</p> <p>14 Statement of Work with Lawson?</p> <p>15 A. I think it went over a month's time.</p> <p>16 I don't know exactly from start to finish. There</p> <p>17 were several revisions of this Statement of Work.</p> <p>18 Q. What's the -- what's your</p> <p>19 understanding about the purpose of this Statement</p> <p>20 of Work?</p> <p>21 A. This is what contractually Lawson was</p> <p>22 obligated to do for us, what their</p> <p>23 responsibilities were, what South Jersey's</p> <p>24 responsibilities were, what work was actually</p> <p>25 going to be performed.</p>		<p>1 A. Yes.</p> <p>2 Q. Do you see there there's a list of</p> <p>3 various business processes?</p> <p>4 A. Yes.</p> <p>5 Q. Is it your understanding that Lawson</p> <p>6 was to be responsible for the business processes</p> <p>7 listed here on page 7?</p> <p>8 A. Responsible in what regard?</p> <p>9 Q. Well, this is defined in the scope of</p> <p>10 the project for the new Lawson Software that was</p> <p>11 going to be installed, correct?</p> <p>12 A. The whole document, yes.</p> <p>13 Q. And what's your understanding about</p> <p>14 the specific business processes here; what's the</p> <p>15 reason they're included in this document?</p> <p>16 A. These are examples of processes that</p> <p>17 would fall under the inventory control module of</p> <p>18 Lawson.</p> <p>19 Q. Okay.</p> <p>20 A. This area doesn't dictate whose</p> <p>21 responsible for doing what regarding that business</p> <p>22 process.</p> <p>23 Q. Okay. One of the business processes</p> <p>24 listed here is "Item Master Management."</p> <p>25 Do you see that?</p>	
	38		40
<p>1 Q. Does the Statement of Work define, as</p> <p>2 well, what type of services that Lawson would</p> <p>3 provide to South Jersey with respect to the</p> <p>4 implementation and installation of the Lawson 9</p> <p>5 Software?</p> <p>6 A. Yes.</p> <p>7 Q. Could you take a look, please, at</p> <p>8 page 6 of the document, which is Bates stamped SJH</p> <p>9 ??</p> <p>10 A. Uh-huh.</p> <p>11 Q. Do you see here there's a Section 3.4</p> <p>12 entitled "Business Process Scope"?</p> <p>13 A. Yes.</p> <p>14 Q. And.</p> <p>15 Can you explain to me what you</p> <p>16 understand that Section 3.4 to mean?</p> <p>17 A. This is a summary of the applications</p> <p>18 that were going to be implementing, what general</p> <p>19 category it fell under, and then specific business</p> <p>20 processes that would be part of that.</p> <p>21 Q. Do you see at the top of page 7,</p> <p>22 Bates stamped SJH 8, there's a box under the</p> <p>23 heading for the column "Application Suite," it</p> <p>24 says, "Supply Chain Management," and to the right</p> <p>25 of it, it says, "Inventory Control"?</p>		<p>1 A. Yes.</p> <p>2 Q. And what's your understanding of what</p> <p>3 that business process involves?</p> <p>4 A. The ability to know how to put items</p> <p>5 into the Item Master, to change information for</p> <p>6 existing items, to be able to delete an item, once</p> <p>7 it's in the Item Master, what else it might need</p> <p>8 to go from there. Like, if it's inventory, then</p> <p>9 you have to put it to an inventory location.</p> <p>10 Q. And who was responsible for the Item</p> <p>11 Master management; was it Lawson or South Jersey</p> <p>12 or was it a shared responsibility?</p> <p>13 A. I was going to say it's shared. I</p> <p>14 mean, ultimately, South Jersey was responsible for</p> <p>15 Item Master management.</p> <p>16 Q. But to the extent it was shared, what</p> <p>17 responsibilities did Lawson have?</p> <p>18 A. They provided training and assistance</p> <p>19 in how it should be set up.</p> <p>20 Q. Turning back to the page before, page</p> <p>21 6, SJH 7, do you see there's -- under the</p> <p>22 "Business Processes" list, one of the processes is</p> <p>23 "Requisition of Goods and Services"?</p> <p>24 A. Yes.</p> <p>25 Q. What's that process meant to</p>	

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 describe?</p> <p>2 A. How requisitions get into the system</p> <p>3 to become purchase orders.</p> <p>4 Q. And whose responsibility within the</p> <p>5 Statement of Work was it to implement the</p> <p>6 requisition of goods and services?</p> <p>7 A. That's a shared responsibility,</p> <p>8 again.</p> <p>9 Q. If you take a look at page 9 of the</p> <p>10 document, SJH 10, there's a Section 3.5, "Data</p> <p>11 Migration and Conversions."</p> <p>12 Do you see that section?</p> <p>13 A. Yes.</p> <p>14 Q. What do you understand data migration</p> <p>15 and conversions to refer to?</p> <p>16 A. Getting the data out of the old</p> <p>17 system into the new.</p> <p>18 Q. And whose responsibility was it under</p> <p>19 the Statement of Work for the data migration and</p> <p>20 conversion?</p> <p>21 A. South Jersey's.</p> <p>22 Q. And was Lawson responsible for</p> <p>23 assisting South Jersey in that process?</p> <p>24 A. They were responsible, yes, to</p> <p>25 assist, but it was our responsibility to actually</p>	<p>41</p> <p>1 Q. Do you have an understanding about</p> <p>2 how the IC811 program is -- the functionality of</p> <p>3 that program?</p> <p>4 A. I can speak to general knowledge of</p> <p>5 how an import program would work, not specifically</p> <p>6 IC811.</p> <p>7 Q. Okay. And what's your general</p> <p>8 knowledge of how an import program would work?</p> <p>9 A. There's a defined file layout that</p> <p>10 you have to populate your data into that format,</p> <p>11 and if you do that correctly, when you run the</p> <p>12 program, it will then take your data and import it</p> <p>13 into the proper fields in the new database</p> <p>14 structure.</p> <p>15 Q. Do you see above this chart here, in</p> <p>16 section 3.5, there's a sentence that reads,</p> <p>17 "Lawson will assist SJHS personnel in formatting,</p> <p>18 error checking and running the API's"?</p> <p>19 A. Yes.</p> <p>20 Q. Did Lawson assist South Jersey</p> <p>21 personnel in formatting, error checking and</p> <p>22 running the API's as part of the data conversion</p> <p>23 process?</p> <p>24 A. Yes.</p> <p>25 Q. Can you describe for me what that</p>
<p>1 do the conversion.</p> <p>2 Q. Do you see there's a chart at the</p> <p>3 bottom of page 9, South Jersey SJH 10, that has</p> <p>4 "Item Number CV-04"?</p> <p>5 A. Yes.</p> <p>6 Q. And the "Conversion Component" listed</p> <p>7 there is "Item Master."</p> <p>8 A. Yes.</p> <p>9 Q. Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. Do you see that there's a designation</p> <p>12 here of "IC811" for the "Conversion Method"?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know what that refers to,</p> <p>15 IC811?</p> <p>16 A. IC811 would be a standard Lawson</p> <p>17 import, that if we followed their specified</p> <p>18 guidelines, we could upload the Item Master using</p> <p>19 that program.</p> <p>20 Q. And what were the specified</p> <p>21 guidelines that Lawson provided with respect to</p> <p>22 using the IC811 import program?</p> <p>23 A. I don't know. I don't believe we use</p> <p>24 IC811. I believe we used the Lawson add-ins to</p> <p>25 upload our Item Master.</p>	<p>42</p> <p>1 assistance entailed?</p> <p>2 A. Knowledge of what needed to be</p> <p>3 populated in the field, if there was an error, how</p> <p>4 to go about resolving what that error would be.</p> <p>5 Q. So Lawson provided you with that</p> <p>6 knowledge necessary for how to populate the fields</p> <p>7 and how to handle errors?</p> <p>8 A. They provided assistance where there</p> <p>9 was questions with it. I mean, a lot of it is</p> <p>10 pretty self-explanatory.</p> <p>11 Q. Okay. On the next page of the</p> <p>12 document, page 10, Bates stamped SJH 11, there's</p> <p>13 an "Activity" described in that chart on the page</p> <p>14 as "Data Migration Workshops," and it says,</p> <p>15 "Responsible, Lawson."</p> <p>16 Did Lawson provide for South Jersey</p> <p>17 data migration workshops to define the data</p> <p>18 migration process for South Jersey?</p> <p>19 A. Not as a formal class. It would just</p> <p>20 be assistance from the consultant as the tasks</p> <p>21 were being performed.</p> <p>22 Q. And do you see on the chart there's</p> <p>23 also an item listed -- an "Activity" listed,</p> <p>24 "Training in data migration tools"?</p> <p>25 A. Yes.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Q. Did Lawson provide training in data 2 migration tools to South Jersey? 3 A. Again, not in a formal class, but as 4 part of a work session. 5 Q. Do you see there's also an "Activity" 6 listed, "Test load sample data"? 7 A. Yes. 8 Q. Do you know what that activity refers 9 to? 10 A. I would believe that that was to load 11 up a small portion of our file to make sure it was 12 formatted properly before running it full out. 13 Q. And did Lawson handle that for South 14 Jersey? 15 A. I'm going to say no. They, together 16 with South Jersey, would go through the steps, but 17 they didn't take anything and specifically do a 18 conversion on their own for us. 19 Q. On the next page, page 11, SJH 12, 20 there's a list of six items under the heading 21 "Data Migration and Conversion Additional 22 Assumptions." 23 Do you see where I'm referring to? 24 A. Yes. 25 Q. And do you see Item 6 says, "The data</p>	<p>45</p> <p>1 Q. And what was involved with the 2 outbound Item Master to OR MIS Surgery System? 3 A. We take -- not every item in our Item 4 Master, but those that OR MIS needs, we have them 5 flagged, and we will take an extract out of our 6 Item Master for them to import into the OR MIS 7 System, so that's now a daily process. OR MIS will 8 pick up that item and charging, cost information, 9 to use in their billing process. 10 Q. And who performs that extraction? 11 A. It's now an automated process. 12 Lawson -- I guess it would be part of Lawson 13 Professional Services. They have an offshore 14 interface group who actually created this 15 interface for us. 16 Q. So Lawson created the interface 17 between its Item Master within the Procurement 18 Suite and the OR MIS Surgery System that now runs 19 automatically? 20 A. Yes. I believe Lawson had a standard 21 job that did this that they just tweaked to meet 22 our needs, so it's a customized interface for us 23 built off of one of their existing programs. 24 Q. Could you turn, please, to page 44 of 25 the document? It's got the label on the bottom,</p>
<p>1 to be converted will be verified and validated 2 during the planning phase which will be conducted 3 jointly by Lawson and SJH"? 4 A. Yes. 5 Q. Is it correct that the data 6 conversion was conducted jointly -- excuse me, 7 that the data conversion was verified and 8 validated jointly by Lawson and South Jersey? 9 A. Yes. 10 Q. Okay. Can you turn, please, to page 11 13, Bates label SJH 14? 12 Do you see there's a chart under the 13 heading "Interface Scope"? 14 A. Yes. 15 Q. And there's an "Interface 16 Description" with the "Interface ID, IF-02." The 17 description reads, "Outbound Item Master to OR MIS 18 Surgery System." 19 A. Yes. 20 Q. Could you describe for me, please, 21 what the OR MIS Surgery System is? 22 A. I'm not intimately familiar with 23 OR MIS, but it is the system that they use in 24 surgery in the OR to schedule their cases and 25 their patients.</p>	<p>46</p> <p>1 SJH 45. 2 Do you see item 19 there entitled 3 "Appendix E: IF-02 Item Master to OR MIS Surgery 4 System Interface"? 5 Is this a description of the 6 customized interface between the Item Master and 7 the OR MIS Surgery System that was developed by 8 Lawson Professional Services. 9 A. This is copies of the Lawson to OR MIS 10 interface that was running in the Lawson 724 11 version. I don't believe Lawson created this 12 initial customization. You can see there's the 13 name Frank Gonzales in here. He was kind of a 14 third party contracted, who I believe did this 15 program. You can see it's a copy of Lawson's 16 standard IC527 interface that was modified and 17 then became ZC527 for our purposes. So this was 18 the basis of how this new interface for Lawson 9 19 would be developed. 20 Q. Do you recall preparing a Request for 21 Proposal that was sent to Lawson in 2007? 22 A. We didn't do a formal RFP, more kind 23 of a spreadsheet, answer these questions type 24 thing, yes. 25 Q. And did South Jersey submit that,</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 what's characterized as an informal RFP, to any      2 other companies besides Lawson?      3 A. Yes.      4 Q. What other companies did you provide      5 this RFP to?      6 A. To McKesson, I believe it went to      7 PeopleSoft, and it may have gone to SAP, but I      8 don't believe it did.      9 Q. And were you responsible for --      10 A. I'm sorry, it also went to Microsoft.      11 Q. Were you the individual at South      12 Jersey responsible for compiling that RFP?      13 A. Each functional area put their      14 questions together. I was responsible for      15 gathering all of that and submitting out to the      16 companies.      17 Q. And how long of an evaluation period      18 was there to evaluate the responses to RFPs that      19 you received?      20 A. It was a several-month process.      21 Q. Did each of the companies that you      22 submitted the RFP to provide you with a response?      23 A. We got responses from Microsoft, from      24 Lawson, from McKesson.      25 Q. At the time that you submitted this</p>	<p>49</p> <p>1 this deposition.      2 Q. You're answering questions I didn't      3 even ask.      4 A. Sorry.      5 Q. You're reading my mind.      6 MR. GRAHAM: Did you mean to ask      7 whether or not South Jersey had submitted an RFP      8 to ePlus?      9 MS. BURKE-ANDERSON: You asked her      10 ePlus. How could she speak to ePlus and Lawson?      11 MR. STRAPP: Right. Let me ask a      12 different question.      13 MS. BURKE-ANDERSON: Okay.      14 Q. Has South Jersey ever submitted an      15 RFP to ePlus?      16 A. Not to my knowledge.      17 (Exhibit South Jersey 5 as received      18 and marked for identification.)      19 Q. You now have in front of you South      20 Jersey 5. This is a cover e-mail and a series of      21 documents.      22 Are you familiar with this series of      23 documents, Ms. Cimino?      24 A. So far, yes.      25 Yes.</p>
<p>1 RFP, had you -- were you using any supply chain or      2 procurement software besides the software that you      3 had from Lawson?      4 A. We use Atpar for handhelds.      5 Q. Atpar or Aptar?      6 A. Atpar, A-T-P-A-R. They provide      7 handhelds that we can upload requisitions from.      8 Q. Do you still use Atpar?      9 A. Yes.      10 Q. Do you use any other procurement or      11 supply chain software besides the software from      12 Lawson and Atpar?      13 A. We use EDI, which goes out through      14 GHX, so I don't know if you would consider that      15 using their software. I mean, GHX is our vendor      16 for all EDI transactions.      17 Q. The EDI, though, is licensed from      18 Lawson?      19 A. Yes.      20 Q. Has Lawson ever submitted an RFP to a      21 company called ePlus?      22 A. I have no idea.      23 Q. Okay. Before you received this --      24 well --      25 A. I've never heard of ePlus prior to</p>	<p>50</p> <p>1 VIDEOGRAPHER: Going off the record      2 at 11:02.,      3 (Off the record.)      4 VIDEOGRAPHER: Back on the record at      5 11:03.,      6 BY MR. STRAPP:      7 Q. Can you please describe for me what      8 the series of documents marked as South Jersey 5      9 is?      10 A. This is our informal RFP request and      11 Lawson's response to that request.      12 Q. And is it correct that you received      13 this response from Lawson to the RFP in February      14 of 2007?      15 A. It was February of 2007? Okay, yes,      16 I didn't realize it went back that far.      17 Q. Why did you decide to choose Lawson      18 over the other companies who you had submitted the      19 RFP to?      20 A. My personal opinion was, Lawson      21 Software provided the best solution for South      22 Jersey Healthcare. McKesson's was not fully      23 integrated, where Lawson was. Microsoft was too      24 new into the product mix to be willing to take a      25 chance.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

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<p>1 Q. Do you see on the cover e-mail that      2 has the label at the bottom right, SJH 115,      3 there's an e-mail from Brian Walker to you, dated      4 February 23, 2007?</p> <p>5 A. Yes.</p> <p>6 Q. And do you see in that e-mail that in      7 the second paragraph Mr. Walker writes, "The      8 proposals for license and services are estimates      9 based on your requirements in the RFP and      10 conversations I have had with Materials Management      11 around their desires to upgrade the current Lawson      12 applications and add new functionality (such as      13 Requisition Self Service, Lawson Business      14 Intelligence, etc.)"?</p> <p>15 A. Yes.</p> <p>16 Q. At the time, in February of 2007, was      17 it your understanding that South Jersey had a      18 desire to upgrade to requisition self-service?</p> <p>19 A. I believe that was the desire of the      20 materials management department.</p> <p>21 Q. And why did you decide at the time --      22 or, let's say, why did you decide in 2008, during      23 the implementation and installation phase, not to      24 upgrade to requisition self-service?</p> <p>25 A. We didn't have the time to bring</p>		<p>1 South Jersey as of February '07 for each of the      2 various Lawson applications that are listed in the      3 chart?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know approximately how many      6 users are licensed to use the procurement --      7 Lawson procurement applications today?</p> <p>8 A. I'd have to look at our contracts. I      9 believe we increased our number of users, but I      10 don't know what we went to.</p> <p>11 Q. Could you turn, please, to SJH 129?      12 Do you see there's a chart --      13 spreadsheet here entitled "South Jersey      14 Healthcare, MATERIAL MANAGEMENT ERP SYSTEM      15 PRIORITY LISTING"?</p> <p>16 A. Yes.</p> <p>17 Q. What's your understanding of what      18 this spreadsheet is meant to convey or reflect?</p> <p>19 A. This was a listing of what we wanted      20 to find in a materials management system and then      21 Lawson's comments on how they met that need.</p> <p>22 Q. And do you recall whether you were      23 satisfied, after reviewing Lawson's comments in      24 this document, that they could meet all of the      25 needs South Jersey had for a material management</p>	
	54		56
<p>1 requisition self-service live at the time we      2 brought the four applications live. We signed the      3 contracts in April, went live in October. That's      4 not a lengthy time frame.</p> <p>5 Q. Do you know approximately how much      6 time would have been required to implement --      7 install and implement requisition self-service?</p> <p>8 A. The fact that we've been live for      9 over a year and still don't have it running, I'd      10 have to really hedge a guess, but...</p> <p>11 Q. But it's your understanding that      12 April of '08 to October of '08 was not enough      13 time -- not sufficient time to install and      14 implement requisition self-service?</p> <p>15 A. Not in conjunction with the other      16 modules that we needed to have up and running.</p> <p>17 Q. Can you take a look, please, at the      18 document with the label on the bottom right, SJH      19 121?</p> <p>20 Do you see there's a chart that has      21 the title "South Jersey Health System Current      22 Lawson Applications"?</p> <p>23 A. Yes.</p> <p>24 Q. Is it your understanding that that      25 chart accurately reflects the number of users at</p>		<p>1 ERP system?</p> <p>2 A. Yes.</p> <p>3 Q. If you take a look at Item 2 in this      4 chart, it's entitled "Inventory Control (IC)      5 Automatic Vendor Reordering - Perpetuals."</p> <p>6 A. Yes.</p> <p>7 Q. Is it your understanding that the      8 Lawson System has the capability of identifying      9 when items fall below a certain volume, such that      10 the system can be configured to automatically      11 place and transmit purchase orders to replenish      12 that item?</p> <p>13 A. Yes.</p> <p>14 Q. And is that true both for items that      15 are nonstock items and items in inventory?</p> <p>16 A. No, it would be for inventory items,      17 because if it's nonstock, we don't have a par      18 level.</p> <p>19 Q. If you take a look at page SJH 133,      20 Item 13, it's entitled "Web Requisitioning."</p> <p>21 A. Yes.</p> <p>22 Q. In the same chart that we're looking      23 at.</p> <p>24 A. Uh-huh.</p> <p>25 Q. Do you see under the column "Vendor</p>	

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1      Comments," there is a statement by Lawson that      2      says, "Once on board, users benefit from many      3      advanced capabilities, such as the ability to      4      automatically generate multiple purchase orders      5      for stock, non-stock, and special-order items, as      6      well as services, from a single requisition"?</p> <p>7      A. Yes.</p> <p>8      Q. Is it your understanding that the      9      Lawson Software that's licensed by South Jersey      10     has the capability of automatically generating      11     multiple purchase orders for nonstock items from a      12     single requisition?</p> <p>13     A. Yes.</p> <p>14     Q. If you take look at the next page at      15     Item 14, "E-procurement - possibly punchout," is      16     it your understanding that part of the RFP -- part      17     of what South Jersey was considering purchasing in      18     2007 as part of its material management ERP system      19     was a punchout functionality within that system?</p> <p>20     A. We wanted to know if we had the      21     ability for punchout. It was never a guarantee      22     that we would be purchasing.</p> <p>23     Q. And what's your understanding of the      24     reason why South Jersey decided not to purchase      25     punchout?</p>	<p>57</p> <p>1      the Item Master to a replacement or substitution      2      item?</p> <p>3      A. Yes.</p> <p>4      Q. And as implemented on the South      5      Jersey System, does the Lawson Software have that      6      capability?</p> <p>7      A. Yes, but I don't believe we're using      8      it.</p> <p>9      Q. Okay. Do you know whether South      10     Jersey has used that functionality at any point      11     within the Lawson Software System?</p> <p>12     A. I'm going to say no. We don't want      13     to have two different item numbers, and this will      14     require two different item numbers, and that's      15     just not a road we want to go down.</p> <p>16     Q. When you say it would require two      17     different item numbers, can you explain that?</p> <p>18     A. You have your primary item in your      19     Item Master and then you would have to link it to      20     what the substitute item was by item number. We      21     don't want to have two different item numbers, we      22     want to use just one.</p> <p>23     Q. So it's your understanding that the      24     Lawson Software has the capability of linking a      25     primary item in the Item Master to a substitute or</p>
<p>58</p> <p>1      A. Cost.</p> <p>2      Q. Have you had any discussions with      3      Lawson, since the installation and implementation      4      of Lawson 9, about adding procurement punchout?</p> <p>5      A. I think I asked our account executive      6      for pricing on that for our last budget year, but      7      that was really the extent of it.</p> <p>8      Q. Okay. If you look at item 20 on page      9      SJH 136, it's entitled "Product substitution      10     Flexibility - Conversion Factor Issues linked to      11     one Lawson #."</p> <p>12     Do you see that?</p> <p>13     A. Yes.</p> <p>14     Q. And do you see in the description, it      15     states, from Lawson, under "Vendor Comments,"      16     "Lawson can associate an item on the Item Master      17     to a Replacement Item should the primary item be      18     discontinued or backordered. Users can be alerted      19     when a Replacement exists or the Replacement can      20     be put into production based on a specified date"?</p> <p>21     A. Yes.</p> <p>22     Q. Is it your understanding that the      23     software -- the procurement and supply chain      24     software licensed by South Jersey from Lawson has      25     the capability of associating a particular item on</p>	<p>58</p> <p>60</p> <p>1      equivalent item, but South Jersey is not currently      2      utilizing that capability?</p> <p>3      A. Correct.</p> <p>4      Q. Do you know whether that      5      functionality within the Lawson Software is such      6      that the item -- the primary item can be from one      7      vendor and the substitute item can be from a      8      second vendor?</p> <p>9      A. I would say yes.</p> <p>10     MR. STRAPP: We'll take a break.</p> <p>11     VIDEOGRAPHER: This marks the end of      12     Volume I, Tape No. 1 in the deposition of Lynn      13     Cimino. Going off the record. The time is 11:16.,      14     (Recess.)</p> <p>15     VIDEOGRAPHER: Back on the record.      16     Here marks the beginning of Volume I, Tape No. 2      17     in the deposition of Lynn Cimino. The time is      18     11:33.,</p> <p>19     BY MR. STRAPP:</p> <p>20     Q. Could you tell me whether the Item      21     Master that South Jersey has in its Lawson      22     Software Suite includes a collection of items and      23     information about those items -- a collection of      24     items and associated information about each of      25     those items?</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 A. Yes.</p> <p>2 Q. And does that associated information</p> <p>3 about the items include part numbers?</p> <p>4 A. The vendor part number, yes.</p> <p>5 Q. Does it include price?</p> <p>6 A. Not in the Item Master.</p> <p>7 Q. Where is the price information</p> <p>8 included?</p> <p>9 A. Well, we have most of our items on</p> <p>10 contract or quote, so pricing would come in there.</p> <p>11 Q. So the pricing data is not available</p> <p>12 when you're viewing the Item Master?</p> <p>13 A. The last price paid may be available,</p> <p>14 but we're not putting in an item and putting in a</p> <p>15 price on that item.</p> <p>16 Q. Does the information about the items</p> <p>17 in the Item Master include a catalog number?</p> <p>18 A. The vendor number?</p> <p>19 Q. Yes.</p> <p>20 A. It has vendor information, yes.</p> <p>21 Q. So it will include a vendor name?</p> <p>22 A. It can.</p> <p>23 Q. Would it include some sort of vendor</p> <p>24 identification code?</p> <p>25 A. The vendor part number or item</p>	<p>61</p> <p>1 through our handhelds, that would actually become</p> <p>2 a req in the system. So in that case, our staff</p> <p>3 goes out to a par location, say the lab, for</p> <p>4 example, they'll download the items to their</p> <p>5 handheld, they'll go through their accounts on</p> <p>6 hand, they'll upload that, the system does its</p> <p>7 math, and anything that needs to be ordered will</p> <p>8 then come through on a requisition, which the</p> <p>9 buyers would then pull that req to turn it into a</p> <p>10 PO.</p> <p>11 Q. Do the buyers ever create</p> <p>12 requisitions within the Lawson System?</p> <p>13 A. Not as a general practice.</p> <p>14 Q. Are there ever occasions where that</p> <p>15 happens?</p> <p>16 A. I'm not going to swear it never has</p> <p>17 happened, but I don't see why a buyer would create</p> <p>18 that as a requisition in the system.</p> <p>19 Q. Okay. You mentioned that users</p> <p>20 create paper requisitions.</p> <p>21 Do users ever create electronic</p> <p>22 requisitions directly on the Lawson System?</p> <p>23 A. No.</p> <p>24 Q. Are you familiar with the process of</p> <p>25 creating an electronic requisition within the</p>
<p>1 number, order number.</p> <p>2 Q. Will the items include a textual</p> <p>3 description of what the item is?</p> <p>4 A. Yes.</p> <p>5 Q. Does the Item Master ever include</p> <p>6 images of the item?</p> <p>7 A. We do not have any images in the</p> <p>8 system.</p> <p>9 Q. Can you walk me, please, through the</p> <p>10 steps of creating a requisition within the Lawson</p> <p>11 Software for an item? Let's say the item is, for</p> <p>12 example, a Band-Aid.</p> <p>13 A. The process from start to finish</p> <p>14 with, like, the end location requesting it or just</p> <p>15 once it's in the system what happens to it?</p> <p>16 Q. Once it's in the system, how would a</p> <p>17 user at South Jersey create a requisition for a</p> <p>18 nonstock item, like, a Band-Aid, say, for example?</p> <p>19 A. A user would create a paper</p> <p>20 requisition, route it around, get all the</p> <p>21 approvals. It would then go to the materials</p> <p>22 department. The buyer would not actually create</p> <p>23 that as a requisition within Lawson, they would</p> <p>24 just go right to a PO.</p> <p>25 If it was an item that we used</p>	<p>62</p> <p>1 Lawson System?</p> <p>2 A. Somewhat.</p> <p>3 Q. Would you be able to demonstrate that</p> <p>4 today?</p> <p>5 A. Through requisition self-service --</p> <p>6 Q. Yes.</p> <p>7 A. -- or --</p> <p>8 Q. Well, let's start with requisition</p> <p>9 self-service.</p> <p>10 A. I could probably walk you through</p> <p>11 that, yes.</p> <p>12 Q. Okay. And what about through the</p> <p>13 requisition module?</p> <p>14 A. I could probably create a req in the</p> <p>15 requisition module. I wouldn't be able to</p> <p>16 demonstrate the upload from a handheld.</p> <p>17 Q. Is the requisition self-service</p> <p>18 demonstration that you could provide through a</p> <p>19 test version of requisition self-service?</p> <p>20 A. Yes.</p> <p>21 Q. Does that test platform or test</p> <p>22 version of requisition self-service include the</p> <p>23 same item data as the Item Master that's available</p> <p>24 on the live system?</p> <p>25 A. It will have most of the information.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

1        The test system is not completely in sync with 2        production, so anything that's been added on the 3        production side since we've copied would not be 4        available.  5        Q.     Do you know when that copy was made 6        in the test system?  7        A.     Within the past two or three weeks.  8        Q.     So it will have almost everything 9        that's on the live system?  10      A.    I don't know what's been added since 11     it's been copied, but it should have most stuff. 12     It's more than ten items, so it's a very good 13     sampling of our live system.  14      Q.    Okay. Have you personally received 15     training from Lawson Professional Services 16     employees on how to use requisition self-service?  17      A.    No.  18      Q.    And how have you come to learn how to 19     use the requisition self-service module?  20      A.    We had a custom work flow designed 21     for our requisition self-service, so the 22     consultant that we used - it was not a Lawson 23     person - kind of walked us through, and then just, 24     you know, overseeing the process of the 25     implementation that our lead analyst was working	65	1        the Lawson process flow software, so that way it 2        can take our requisition and route it to the 3        appropriate approver, so it will -- the end user 4        puts in their electronic req, and then based on 5        what they put in there, will route to somebody for 6        approval, and then to the next level for approval, 7        or wherever it needs to go, until all approvals 8        have been met. Then it would come in kind of as a 9        completed req ready to be imported into Lawson.  10      Q.    Is South Jersey currently licensing 11     requisition self-service from Lawson?  12      A.    Yes.  13      Q.    So there's a license fee paid by 14     South Jersey to Lawson for requisition 15     self-service currently?  16      A.    Well, the software was purchased. We 17     pay ongoing maintenance.  18      Q.    Okay. And there's a custom work flow 19     that's already in place for requisition 20     self-service?  21      A.    In test, yes.  22      Q.    And is there an estimated -- I might 23     have already asked you this, but let me ask you 24     again if I have, is there an estimated date on 25     which requisition self-service will be available	67
1        on for the implementation, so I didn't personally 2        set up requisition self-service, but I've seen it 3        work.  4        Q.    Who was the consultant that was used 5        to create the custom work flow for the requisition 6        self-service?  7        A.    I don't recall his name.  8        Q.    Do you know what company he worked 9        for?  10      A.    ISH Consulting, I believe, but...  11      Q.    And was this individual, this 12     consultant, a subcontractor of Lawson?  13      A.    No. South Jersey contracted directly 14     with that company.  15      Q.    Do you recall when this custom work 16     flow for the requisition self-service was set up?  17      A.    It was somewhere between March and, 18     I'm going to say, August of '09.  19      Q.    Do you recall why there was a custom 20     work flow set up for requisition self-service?  21      A.    We needed a custom work flow to match 22     our routing and our approval process.  23      Q.    Can you explain for me what you mean 24     when you use the term custom work flow?  25      A.    The custom work flow, it's written on	66	1        to South Jersey users?  2        A.    Not at this time.  3        Q.    So is it your understanding that 4        requisitions will be electronically created by 5        users at South Jersey once the requisition 6        self-service system is available?  7        A.    Yes. The intent is to do away with 8        all paper requisitions.  9        Q.    Are you familiar with the catalog 10      search functionality within requisition 11      self-service?  12      A.    Somewhat.  13      Q.    Are you familiar with the 14      functionality of searching by category within 15      requisition self-service?  16      A.    Not specifically.  17      Q.    Is it possible to search within 18     requisition self-service by a manufacturer name?  19      A.    Like, a Zimmer name; like, our 20     product name?  21      Q.    No. I mean, like Owens & Minor or 22     Cardinal, a vendor name maybe is a better way to 23     describe it.  24      A.    You can search for vendors, but not 25     for a specific item by vendor like that regard.	68

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Q. Does Lawson intend -- sorry, does 2 South Jersey intend to import UNSPSC codes to its 3 requisition self-service module? 4 A. It hasn't really been discussed. 5 I think there's a general movement towards using 6 UNSPSC codes, but we haven't developed any plan of 7 action with that regard. 8 Q. With respect to the system currently 9 in place for requisitions and purchase orders, you 10 mentioned that the requisitions are created on 11 paper by users at South Jersey, correct? 12 A. Some are. Some are done through 13 those handhelds. 14 Q. Handhelds. 15 And the handheld is using the Atpar 16 System? 17 A. Yes. 18 Q. When a purchase order -- when a buyer 19 of the Materials Management Group in South Jersey 20 receives a paper requisition, can you describe for 21 me the steps that that buyer will take in order to 22 enter a purchase order into the system? 23 A. The buyer will first verify that it 24 has the approvals that it needs. If it doesn't, 25 it will send it back to the requesters themselves,</p>	<p>69</p> <p>1 A. Yes. 2 Q. Are you familiar with this document? 3 A. I'm familiar with the Inventory 4 Control User Guide, but we're on Version 9.0, not 5 9.0.1, so I've never looked at the 9.0.1 Inventory 6 Control User Guide. 7 Q. Okay. Do you know when Version 9.0 8 of the Inventory Control User Guide was published 9 by Lawson? 10 A. No. 11 Q. Do you know whether there are any 12 differences between the User Guide Version 9.0 and 13 the User Guide Version 9.0.1? 14 A. I don't know for certain. 15 Q. Can you turn to page 78 of this 16 document, please? It's got the Bates number on 17 the bottom right of L 32326. 18 Do you see there is a section here 19 entitled "Options for Setting up Item Master"?</p> <p>20 A. Yes. 21 Q. And it states in the document, "You 22 can create a speed entry form to customize your 23 item setup process," and then there are steps 24 provided for creating a speed entry form. 25 Are you familiar with this speed</p>
<p>1 or if it's a capital item, it will go to finance 2 for coding and expenses. 3 Once all approvals are there, they 4 will then generate the purchase order using the 5 Lawson application. 6 Q. And do they receive a purchase order 7 acknowledgment after the purchase order has been 8 submitted to the vendor for a nonstock item? 9 A. Yes. 10 Q. And does the purchase order 11 acknowledgment include information about whether 12 the nonstock item is available in inventory from a 13 particular vendor? 14 A. We don't take the acknowledgments 15 back into the system, but I would believe that 16 what they're getting back from the vendor will 17 indicate whether it's on backorder or not. 18 (Exhibit South Jersey 6 was received 19 and marked for identification.) 20 Q. The court reporter has handed you 21 what has been marked as South Jersey 6. It's a 22 document entitled "Inventory Control User Guide, 23 Version 9.0.1." 24 Do you have that document in front of 25 you now?</p>	<p>70</p> <p>1 entry form that's described here? 2 A. No. 3 Q. Could you turn back a few pages to 73 4 at Bates number L 32321? 5 A. Okay. 6 Q. Do you see there's a section here 7 entitled "Setting up the Item Master"?</p> <p>8 A. Yes. 9 Q. Do you know whether the steps 10 described in this section were followed by South 11 Jersey when it was setting up its Item Master for 12 the version of the Lawson Software that it 13 purchased in 2008? 14 A. Did we follow these steps in this 15 order or -- I mean, this information, yes, was put 16 into the file that we used to upload into our Item 17 Master. 18 Q. Okay. Are the versions of the User 19 Guide that South Jersey has all Versions 9.0? 20 A. Yes. 21 (Exhibit South Jersey 7 was received 22 and marked for identification.) 23 Q. You now have in front of you South 24 Jersey 6, which is entitled "Purchase Order User 25 Guide, Version 9.0.1."</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Are you familiar with Version 9.0 2 Purchase Order User Guide? 3 A. Yes. 4 Q. And does South Jersey use the Version 5 9.0 of the Purchase Order User Guide? 6 A. Yes. 7 Q. Do you know -- I'm sorry, I'm sorry, 8 this is Exhibit 7, not Exhibit 6. 9 What's the purpose of this Purchase 10 Order User Guide that South Jersey has in its 11 possession? 12 A. It will walk you through steps in the 13 required set-up, and then it's just knowledge. If 14 you're not sure of something, you can refer to it. 15 Q. Okay. And what was the purpose of 16 the Inventory Control User Guide that we just 17 looked at previously? 18 A. For set-up on the inventory control 19 screens and functionality, and then general 20 information about how that works. 21 Q. Can you turn to page 43, please, of 22 the document, Bates number L 52061? 23 Do you see there's a section entitled 24 "What is a Vendor Item"? 25 A. Yes.</p>	<p>73</p> <p>1 speculation. 2 A. I was going to say, I don't know, we 3 don't use the substitute items. 4 Q. Well, if you have one item number in 5 the Item Master that's used for a particular item 6 that could be purchased from two different 7 vendors, how does the system know which vendor you 8 intend to purchase it from if you put in the one 9 item number that applies to the item from the two 10 vendors; is there a default primary vendor? 11 A. I don't know that you mark one of 12 those vendors as primary over the other. I don't 13 believe there's a field for that. But because our 14 items are tied to contracts and we have a default 15 pricing scheme, the item that's on contract is 16 tied to the vendor, and that's how it would 17 default for us. 18 Q. If the item that was on contract was 19 unavailable, could the user then purchase that 20 item from the second vendor? 21 A. The user could purchase that item 22 from the second vendor any time they wanted to by 23 overriding the default vendor that's populated on 24 the PO. 25 Q. So the two items with the same item</p>
<p>1 Q. And the last sentence in that 2 paragraph states, "You can assign multiple vendor 3 items for the same vendor to one Lawson item." 4 Do you see that? 5 A. Yes. 6 Q. Do you have an understanding of what 7 that sentence means? 8 A. Yes. 9 Q. Can you explain, please? 10 A. You have one item number in your Item 11 Master that you could purchase from two different 12 vendors, so you can set up the purchase 13 information for each of those vendors, what the 14 vendor's order number or item number would be and 15 information specific to the vendor. 16 Q. And we were discussing earlier the 17 ability to set up a primary item and a substitute 18 item. 19 A. Uh-huh. 20 Q. Would it be the case that you could 21 set up the primary item, such that it's purchased 22 from one vendor, and a substitute item, such as 23 it's purchased from the second vendor, yet they 24 both have the same item number? 25 MR. GRAHAM: Objection; calls for</p>	<p>74</p> <p>1 number from the two different vendors would either 2 be identical items or generally equivalent items? 3 A. Yes. 4 Q. Can you turn, please, to page 63. It 5 has the Bates number L 52081. There's a section 6 in the document entitled "Setting Up Vendor 7 Items," and it says under this heading that the 8 first step to set up a vendor item or to set up 9 multiple vendor items is to access vendor items PO 10 13.3. 11 Do you see that? 12 A. Yes. 13 Q. Are you familiar with the PO 13.3 14 program? 15 A. I'm familiar with 13.1 more so, 16 but... 17 Q. And what is the 13.1 program used to 18 do? 19 A. That's where you actually assign the 20 vendor to that item, so my Band-Aids get assigned 21 to Owens or Medline or something like that. 22 Q. Did Lawson run this 13.1 program or 23 was that implemented by South Jersey? 24 A. 13.1 is really a form, it's not 25 actually a program, so when you say run it, I</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 don't know what that really means.</p> <p>2 Q. Who compiles the information for the</p> <p>3 form that has that 13.1 designation?</p> <p>4 A. South Jersey.</p> <p>5 Q. And does Lawson provide training on</p> <p>6 how to complete that form?</p> <p>7 A. Yes.</p> <p>8 Q. Can the vendor identification code be</p> <p>9 used as a -- is that a searchable field within</p> <p>10 requisition self-service?</p> <p>11 A. I don't know.</p> <p>12 Q. Would you turn the page to page 64,</p> <p>13 L 52082? There's a heading here, "Setting Up a</p> <p>14 Substitute Vendor Item?</p> <p>15 A. Uh-huh.</p> <p>16 Q. Are you familiar with the substitute</p> <p>17 vendor item set-up procedure?</p> <p>18 A. No.</p> <p>19 Q. Can you turn, please, to page 90? It</p> <p>20 has the number on the bottom, L 52108.</p> <p>21 A. Okay.</p> <p>22 Q. Do you see there's a section entitled</p> <p>23 "Interfacing Data"?</p> <p>24 A. Yes.</p> <p>25 Q. And it reads, in the paragraph</p>	<p>77</p> <p>1 our master terms and conditions agreement with</p> <p>2 Lawson when we purchased our software for the</p> <p>3 upgrade.</p> <p>4 Q. And I see that for South Jersey the</p> <p>5 name of the individual who signed this document is</p> <p>6 John DiAngelo.</p> <p>7 Is he currently the CFO of South</p> <p>8 Jersey?</p> <p>9 A. Yes.</p> <p>10 Q. And do you report to John DiAngelo?</p> <p>11 A. Indirectly.</p> <p>12 Q. Who is your direct manager?</p> <p>13 A. My direct manager is Carol Mosley.</p> <p>14 Q. What's her --</p> <p>15 A. Shall I keep going up the chain until</p> <p>16 we get to John or --</p> <p>17 Q. Sure. Well, let's start with --</p> <p>18 A. Carol?</p> <p>19 Q. Carol, yeah.</p> <p>20 A. Carol Mosley is the director of</p> <p>21 business systems. She in turn reports to Tom</p> <p>22 Pasik, who is the CIO and chief information</p> <p>23 officer, who directly reports to John DiAngelo.</p> <p>24 Q. Can you turn to Section 2.2.1 of this</p> <p>25 master terms and conditions? It's on page 3,</p>
<p>1 underneath the heading, "You must prepare the</p> <p>2 non-Lawson interface files that contain the vendor</p> <p>3 items and pricing information, transfer the</p> <p>4 non-Lawson files to the server where your S3</p> <p>5 Lawson System Foundation is installed, and load</p> <p>6 each transferred file into the appropriate Lawson</p> <p>7 interface file."</p> <p>8 Do you know whether South Jersey ever</p> <p>9 loaded onto its Lawson Software, non-Lawson</p> <p>10 interface files with vendor items and pricing</p> <p>11 information?</p> <p>12 A. We have contracts that are loaded in</p> <p>13 the system, but we use the add-ins to upload our</p> <p>14 contract information.</p> <p>15 Q. You haven't used PO 536, the vendor</p> <p>16 price agreement load, to convert data?</p> <p>17 A. No.</p> <p>18 (Exhibit South Jersey 8 was received</p> <p>19 and marked for identification.)</p> <p>20 Q. You have in front of you now South</p> <p>21 Jersey 8.</p> <p>22 Do you recognize this document?</p> <p>23 A. Yes.</p> <p>24 Q. What is the document?</p> <p>25 A. This is our product order form and</p>	<p>78</p> <p>1 Bates number SJH 101.</p> <p>2 A. 2.2.1?</p> <p>3 Q. Sorry, 2.2.3.</p> <p>4 A. Okay.</p> <p>5 Q. Do you see that it states there,</p> <p>6 "Customer may copy the Lawson Documentation and</p> <p>7 Service Deliverables only for use with the</p> <p>8 applicable Software under the License"?</p> <p>9 A. Yes.</p> <p>10 Q. And do you see in Section 2.2.1, it</p> <p>11 says, "The Specified Customer identified in an</p> <p>12 Order Form may copy the Software listed in that</p> <p>13 Order Form only for backup and archival purposes"?</p> <p>14 A. Yes.</p> <p>15 Q. Is it your understanding that those</p> <p>16 are the terms and conditions that apply to South</p> <p>17 Jersey's use of the Lawson Software?</p> <p>18 A. Yes.</p> <p>19 Q. And if you take a look at Section</p> <p>20 2.4.1, it states, "Customer may modify the Lawson</p> <p>21 Products and Service Deliverables only to the</p> <p>22 extent permitted under an Order Form or described</p> <p>23 in the Documentation for those Products."</p> <p>24 Do you understand that Lawson --</p> <p>25 excuse me, that South Jersey is only permitted to</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 modify the Lawson Software to the extent permitted 2 under an order form or described in the 3 documentation? 4 A. Yes. 5 Q. And, generally, with respect to this 6 document, do you have an understanding that there 7 are certain restrictions on the use and 8 installation of the Lawson Software that South 9 Jersey has agreed to in connection with its 10 license of the software? 11 A. Yes. 12 (Exhibit South Jersey 9 was received 13 and marked for identification.) 14 Q. You have in front of you now what has 15 been marked as Exhibit South Jersey 9. You'll see 16 that this is a series of documents and that the 17 first page of this series of documents is a cover 18 e-mail that has your name on it. 19 A. Yes. 20 Q. Are you familiar with this set of 21 documents? 22 A. Yes. 23 Q. Can you describe for me, please, what 24 it is? 25 A. This was Lawson's proposal for the</p>	<p>81</p> <p>1 Let me ask that question again. 2 A. Yeah. 3 Q. I'm sorry. 4 Was this proposal accepted by South 5 Jersey in the form that it's presented here? 6 A. I don't know without our actual 7 contract to compare. 8 Q. Okay. Do you know approximately what 9 the annual license fee is that's paid by South 10 Jersey to Lawson for the Lawson supply chain 11 management system? 12 A. My maintenance is bundled together, 13 so specifically for supply chain, no. 14 Q. What's the total fee that's paid to 15 Lawson on an annual basis by South Jersey? 16 A. Somewhere in the neighborhood of 17 \$90,000. 18 Q. Take a look, please, at SJH 150. 19 A. Okay. 20 Q. And do you see there's a title for 21 this page, "OPTIONAL INTERFACE/CONVERSION 22 PACKAGE"? 23 A. Yes. 24 Q. And if you take a look towards the 25 middle of the page, there's a subheading,</p>
<p>1 software modules that we were going to implement, 2 the service that they were going to provide with 3 the costing to back that up, as well as, like, 4 their implementation approach. 5 Q. Was this a follow-on proposal in 6 response to the RFP that was sent to Lawson 7 earlier in 2007? 8 A. Yes. 9 Q. If you take a look at the page with 10 the number SJH 145. 11 A. Okay. 12 Q. Do you see that there is some 13 information on software proposal details on that 14 page? 15 A. Yes. 16 Q. And there's a proposal here to add a 17 certain amount of users for modules of the supply 18 chain management system? 19 A. Yes. 20 Q. Do you have an understanding of what 21 the contract was that -- how the numbers compared 22 in the actual contract that was signed with Lawson 23 as compared to this proposal that was provided by 24 Lawson in 2007? 25 A. Excuse me?</p>	<p>82</p> <p>1 "Procurement/Supply Chain Management Suite." 2 A. Yes. 3 Q. Can you tell me whether -- well, 4 underneath that there's a separate subheading that 5 says "Conversion Package, Inventory Item Master 6 Conversion, Vendor Master Conversion." 7 A. Yes. 8 Q. Do you know whether South Jersey 9 agreed to this optional conversion package offered 10 by Lawson? 11 A. I don't believe we did. We did all 12 of our conversion ourselves. 13 Q. But did Lawson assist you in any way 14 with respect to that conversion? 15 A. To let us know what file layouts to 16 use, what data would go in the appropriate fields. 17 Q. Do you know whether South Jersey has 18 in its possession, any Requisitions Self-Service 19 User Guide? 20 A. Yes, I do. 21 Q. And do you know what version of the 22 Requisitions Self-Service Guide? 23 A. Not off the top of my head. 24 (Exhibit South Jersey 10 was received 25 and marked for identification.)</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Q. You now have in front of you what has 2 been marked as South Jersey 10. It's entitled 3 "Lawson Requisitions Self-Service User Guide, 4 Version 9.0.1." 5 Are you familiar with this document? 6 A. I have a Requisitions Self-Service 7 User Guide. Now that I see their version number 8 is similar to the applications, I'm going to say 9 I'm familiar with 9.0.0, again, not 9.0.1. 10 Q. And did you download the 9.0.0 11 version of this User Guide from the Lawson 12 website? 13 A. Yes. 14 Q. Was that from my mylawson.com? 15 A. Yes. 16 Q. Could you turn, please, to page 26? 17 It has the Bates number on the bottom, L 45499. 18 Do you see there there's a "Form" 19 described as the "Keyword Search Setup" form? 20 A. Yes. 21 Q. Are you familiar with that form? 22 A. I can't picture that form in my mind, 23 but, I mean, I know there is set-up for search 24 functions. 25 Q. On the test version of requisition</p>	<p>85</p> <p>1 Jersey's version of requisition self-service? 2 A. It allowed us the ability to put a 3 purchasing class, if you would, that we could use 4 for routing the requisition. 5 Q. Okay. And what do you mean by a 6 purchasing class? 7 A. If it's a capital item, it gets a 8 purchasing -- probably not -- purchasing class may 9 not be the real word to use, but if it's a capital 10 item, it would get that code to go along the 11 capital approval process. If it's an IT item, it 12 would get that code so it could go along the IT 13 approval process. If it's just a general 14 requisition, you kind of get miscellaneous to 15 flow-through, that approval process. 16 Q. And did the custom work flow include 17 any additional customization besides designing who 18 approved certain items? 19 A. It did provide some displays on the 20 screen for us so we could see -- I believe one of 21 the things was comments. If you -- on our paper 22 racks, we have a justification section where we 23 put comments. The comments weren't being 24 displayed on the screen that the approver would 25 see to know what the justification was for, so</p>
<p>1 self-service that you said you might be able -- 2 you said you would be able to demonstrate, has 3 Lawson set up for that test system, keyword 4 searches? 5 A. Lawson hasn't done any set up of our 6 requisition software. 7 Q. I'm sorry. 8 Has South Jersey set up keyword 9 search set-ups using the form described here? 10 A. I'm not positive. 11 Q. And if you take a look at the next 12 page, page 27, Bates number L 45500, there's this 13 heading here, "Defining Categories." 14 A. Yes. 15 Q. On the test system of requisition 16 self-service that South Jersey has, has it set up 17 any categories as described on this document? 18 A. I don't believe so. 19 Q. You were talking earlier about a 20 custom work flow that was designed for requisition 21 self-service. 22 A. Yes. 23 Q. Can you describe for me what that 24 custom work flow includes, the specific 25 customization that was made available for South</p>	<p>86</p> <p>1 that was added. I think some formatting was done 2 along the pricing, so it would display decimals 3 and dollars and perhaps make the fields bigger or 4 a different color, that type of stuff. 5 Q. Do the collection of items in the 6 Item Master within the requisition self-service 7 module that South Jersey is licensed include part 8 numbers? 9 A. Can you repeat the question? 10 Q. Sure. 11 The collection of items within the 12 Item Master for requisition self-service, does 13 that include the same information for each of 14 those items as would be available in the older 15 version of requisition, Item Master? 16 A. I don't believe requisition 17 self-service has its own Item Master, so it's 18 referencing whatever is in the Lawson Item Master. 19 MR. STRAPP: I think we should take a 20 break here. 21 VIDEOGRAPHER: Going off the record. 22 The time is 12:18., 23 (Luncheon recess.) 24 VIDEOGRAPHER: Back on the record at 25 1:14.,</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 BY MR. STRAPP:</p> <p>2 Q. Ms. Cimino, you have in front of you</p> <p>3 a computer that is networked to the South Jersey</p> <p>4 intranet; is that correct?</p> <p>5 A. To the hospital's network.</p> <p>6 Q. To the hospital's network?</p> <p>7 A. Yes.</p> <p>8 Q. And on the hospital's network, the</p> <p>9 Lawson application -- the Lawson log-in portal is</p> <p>10 available to all users; is that correct?</p> <p>11 A. To anybody who has access to the</p> <p>12 Lawson application.</p> <p>13 Q. And you have access to the Lawson</p> <p>14 application through the particular computer that's</p> <p>15 in front of you right now?</p> <p>16 A. Yes.</p> <p>17 Q. And what is on the screen in front of</p> <p>18 you currently?</p> <p>19 A. This is the log-in screen to our test</p> <p>20 system.</p> <p>21 Q. Could you please log into the Lawson</p> <p>22 System.</p> <p>23 Could you select for me, on the left,</p> <p>24 Requisition Self-Service.</p> <p>25 MR. STRAPP: Could we go off the</p>	<p>89</p> <p>1 little checkmarks showed me if it was stock or</p> <p>2 nonstock.</p> <p>3 Q. But they're not displaying here?</p> <p>4 A. They're not displaying right now.</p> <p>5 Q. Let's try searching for another item.</p> <p>6 Let's try to find one that's</p> <p>7 nonstock.</p> <p>8 A. Now you're putting me on the spot to</p> <p>9 think of a nonstock item.</p> <p>10 Q. How about masks, would that be stock?</p> <p>11 (No results.)</p> <p>12 Q. Paper.</p> <p>13 Okay. Could you scroll down here so</p> <p>14 I can see that whole -- yes, exactly.</p> <p>15 A. Do you want me to keep going?</p> <p>16 Q. Yes, please.</p> <p>17 Where it says, Paper Copier White,</p> <p>18 there's a CA next to it.</p> <p>19 A. Uh-huh.</p> <p>20 Q. Does the CA stand for a particular</p> <p>21 vendor?</p> <p>22 A. The CA stands for case per unit of</p> <p>23 measure.</p> <p>24 Q. Oh, okay.</p> <p>25 Could you click on that particular</p>
<p>90</p> <p>1 record for one minute, please?</p> <p>2 VIDEOGRAPHER: Going off the record</p> <p>3 at 1:16.,</p> <p>4 (Off the record.)</p> <p>5 VIDEOGRAPHER: Back on the record at</p> <p>6 1:17.,</p> <p>7 BY MR. STRAPP:</p> <p>8 Q. Could you please select Shopping</p> <p>9 under the Requisition Self-Service.</p> <p>10 A. I'm sorry, I have to log in as a</p> <p>11 different user so you can see the requisition</p> <p>12 self-service.</p> <p>13 Q. Okay. Could you click on the</p> <p>14 Find/Shop on the Menu list there and select Search</p> <p>15 Catalog.</p> <p>16 Can you search for an item that you</p> <p>17 know is going to be in inventory, where there's</p> <p>18 multiple items available for multiple vendors.</p> <p>19 A. You want me to search by description,</p> <p>20 like, toothbrush?</p> <p>21 Q. Sure.</p> <p>22 A. Okay.</p> <p>23 Q. Can you tell from this display here</p> <p>24 whether these are nonstock or stock items?</p> <p>25 A. No. I can't -- I thought that those</p>	<p>90</p> <p>1 item that you're looking at there that says, Paper</p> <p>2 Copier White.</p> <p>3 A. On the item number here, you mean?</p> <p>4 Q. Yes, Item No. 1044001.</p> <p>5 And what's the vendor name here?</p> <p>6 A. The vendor name?</p> <p>7 Q. Yes.</p> <p>8 A. Network Services/Dubin Paper.</p> <p>9 Q. Could you go back to the list of</p> <p>10 search results we just had.</p> <p>11 Scroll down again, please.</p> <p>12 Could you now click on 1044003.</p> <p>13 That's also Dubin Paper.</p> <p>14 Okay. Could you go back to the</p> <p>15 search list again, please.</p> <p>16 I'm looking to see whether there's</p> <p>17 any additional nonstock items here that are from</p> <p>18 different -- paper items that are from different</p> <p>19 manufacturers other than Dubin, so let's scroll</p> <p>20 down some more to see if we can find one.</p> <p>21 That's it then.</p> <p>22 Could you scroll back up a little,</p> <p>23 please.</p> <p>24 How about the ECG Paper 2 Fold,</p> <p>25 1021229. Do you happen to know what a Paper 2</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Fold is?</p> <p>2 No?</p> <p>3 A. It's ECG paper with two folds in it,</p> <p>4 is what it sounds like to me.</p> <p>5 Q. Oh, it's electrocardiogram paper?</p> <p>6 A. That would be my guess from that.</p> <p>7 Q. Okay. Could you go back to the</p> <p>8 search list one more time, please.</p> <p>9 If you click on 1013019.</p> <p>10 A. 1013019, this one?</p> <p>11 Q. Right.</p> <p>12 Paper Recorder ECG.</p> <p>13 All right. I want to search for a</p> <p>14 different item.</p> <p>15 Up in the search box, yeah, let's go</p> <p>16 back.</p> <p>17 All right. Let's try searching for</p> <p>18 gloves or glove.</p> <p>19 Okay. There's one nonstock item.</p> <p>20 Are there any others there?</p> <p>21 A. This one here.</p> <p>22 Q. That's it?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Can we check to see if one of the</p> <p>25 items that doesn't have a checkmark next to it is</p>	<p>93</p> <p>1 information.</p> <p>2 Q. Do you know what manufacturer that</p> <p>3 is, what that code refers to?</p> <p>4 A. No, I'd have to look that particular</p> <p>5 code up.</p> <p>6 Q. Okay. Let's go back.</p> <p>7 There's manufacturer codes next to</p> <p>8 each of these -- underneath each of these item</p> <p>9 numbers, correct?</p> <p>10 Do you recognize any of those</p> <p>11 manufacturer codes -- do you recognize who the</p> <p>12 manufacturers are based on any of those codes?</p> <p>13 A. The MEDL, I believe, is Medline.</p> <p>14 Q. Okay. Do you know who ANSC is?</p> <p>15 A. No.</p> <p>16 Q. Or BURL?</p> <p>17 A. No.</p> <p>18 Q. Do you know who MOLN is?</p> <p>19 A. No.</p> <p>20 Q. Let's search for lotion.</p> <p>21 Okay. Can you click on the 1030363.</p> <p>22 All right. Now, could you go back,</p> <p>23 please.</p> <p>24 Can you tell by that description of</p> <p>25 the item whether that's a stock or a nonstock, the</p>	
<p>1 also a nonstock item that could be ordered, like,</p> <p>2 for example, glove, exam, latex, NS, small, right</p> <p>3 there, 1014007. That doesn't have any vendor</p> <p>4 information.</p> <p>5 Do you know whether that means that</p> <p>6 that item has been discontinued or it can't be</p> <p>7 ordered?</p> <p>8 A. No, it just means that they don't</p> <p>9 have all the information set up in the Item</p> <p>10 Master.</p> <p>11 Q. Okay. And that's why there's no --</p> <p>12 that's why it doesn't display whether it's</p> <p>13 nonstock or stock, because there's not enough</p> <p>14 information there to determine whether it's stock</p> <p>15 or nonstock?</p> <p>16 A. It doesn't display the vendor</p> <p>17 information because on the IC record it probably</p> <p>18 doesn't exist. I'm not really sure why the</p> <p>19 nonstock and stock flags are not showing. The</p> <p>20 stock items at your location, she -- this user</p> <p>21 could have various locations and it doesn't know</p> <p>22 what location it's looking for yet.</p> <p>23 Q. Does the manufacturer code SEPM</p> <p>24 indicate who the manufacturer of these gloves are?</p> <p>25 A. Yes, that's the manufacturer</p>	<p>94</p> <p>1 Lotion Cleansing 4IN1 8oz. Remedy that we just</p> <p>2 looked at?</p> <p>3 A. I can't tell on description if it's</p> <p>4 stock or nonstock.</p> <p>5 Q. Okay. What about the -- can you</p> <p>6 click on the last item here on this list, Lotion</p> <p>7 Hand &amp; Body?</p> <p>8 Okay. Let's -- all right, let's --</p> <p>9 can you go back to -- go back -- could you click</p> <p>10 on the Advanced Search tab up at the top of the</p> <p>11 screen there. Yeah, that one.</p> <p>12 All right. Now -- I'm sorry, I just</p> <p>13 want to take a look, again, at the -- can you</p> <p>14 click on the first item on the list now.</p> <p>15 Thanks.</p> <p>16 All right. Let's go back.</p> <p>17 Do you see how there's cost data</p> <p>18 available for the last two items, but not for the</p> <p>19 first two on this list?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Where does -- the cost data that's</p> <p>22 available for the items at the bottom of this</p> <p>23 list, where does that reside; is that in the Item</p> <p>24 Master?</p> <p>25 A. The cost is not in the Item Master.</p>	<p>96</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 I don't know specifically where it's pulling this      2 cost from, if it's coming because these items are      3 on contract or if it's defaulting in here the last      4 PO price.      5 Q. If an item is on contract, does that      6 information get pulled into the Item Master?      7 A. Not into the Item Master, but there's      8 a contracts screen where I would see the contract      9 information.      10 Q. Okay. And that contract information      11 would be viewable to someone using requisition      12 self-service?      13 A. No.      14 Q. So when I do a search and I see cost      15 data up there, is it going to be the case that      16 that cost data comes from the previous time that      17 this was purchased?      18 A. I don't know.      19 Q. Okay. Can you click on the third      20 item here, 1030363.      21 Okay. Now, go back, please, and      22 click on the fourth item.      23 Okay. Now, up in the search box      24 there where you have Lotion, can you now go in      25 there and search instead for Medline?</p>	<p>97</p> <p>1 the error.      2 Q. No -- I am done, but...      3 A. Okay.      4 Q. Is this -- do you know what this      5 error is here?      6 A. It's not taking my order --      7 Q. For that item?      8 A. -- because this account number that      9 this item has been set up to is nonexistent.      10 Q. Okay. So let's delete that from the      11 Shopping Cart.      12 A. Okay.      13 Q. Now, let's go back to the diaper list      14 again.      15 And let's scroll down here.      16 Could you select Diaper Huggies      17 medium.      18 All right. Go back.      19 Scroll down again.      20 Could you select Diaper Goodnights      21 65lbs and over.      22 Okay. Let's add this one.      23 So we have now, in the cart, two      24 different types of diapers, two types of diapers      25 from two different manufacturers right now.</p>
<p>1 Now, can you perform -- can you go in      2 the search and do Medline, space, lotion, and now      3 click Search.      4 All right. Let's go back to Lotion,      5 so a search just for lotion.      6 And at the bottom there, let's select      7 1424153.      8 Okay. Now, let's add that to the      9 cart, the Shopping Cart.      10 Okay. Now, let's go back to the      11 lotion search again, and can you add 1030363.      12 Okay. Let's delete the first item      13 from the shopping cart.      14 All right. Select catalog search      15 again from Find/Shop at the top, search catalog.      16 And let's search for diaper.      17 Okay. Scroll down.      18 All right. Do you see where it says,      19 Diaper Huggies, Item 1430969?      20 A. Uh-huh.      21 Q. Let's select that.      22 And let's add that to the cart.      23 Okay. Now, can you select Checkout      24 at the bottom of the screen.      25 A. I don't know if you're done reading</p>	<p>98</p> <p>100</p> <p>1 Can you now try checking out both of      2 these.      3 Okay. Now, when it says that the      4 order has been approved, what does that mean?      5 A. It said the order was complete. It      6 needs to be approved now.      7 Q. Okay.      8 A. So now, whoever is the approver for      9 this requester will get an alert to say that      10 there's an order pending your approval.      11 Q. Okay. Could you go back to the      12 Lawson portal window.      13 Let's log in again.      14 A. Are you going to want to see req      15 self-service? I'm not sure which user --      16 Q. Yeah, I want to see req self-service,      17 I want to see the approval process for the      18 requisition now.      19 A. I don't know that I can walk you      20 through the whole process, because I don't know if      21 it's all set up in here.      22 Q. Okay. So let's select -- is there an      23 in basket here?      24 Let's go to approvals under      25 requisition self-service.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1           Do you see that down at the bottom?</p> <p>2           Should that -- all right, so you're</p> <p>3           going to log in here.</p> <p>4           It's not listing any requisitions</p> <p>5           needing approval.</p> <p>6           A. Well, that's requisitions that she</p> <p>7           would need to approve. She doesn't have any.</p> <p>8           Q. I see.</p> <p>9           So someone else would be approving</p> <p>10          these requisitions?</p> <p>11          A. For her, yes.</p> <p>12          Q. Do you know who the right log-on</p> <p>13          would be for that?</p> <p>14          A. No.</p> <p>15          Q. Okay. Let's go back to the search</p> <p>16          screen that we were in before the shopping tab</p> <p>17          under requisition self-service.</p> <p>18          Could we search Huggies there.</p> <p>19          And let's select on Diaper Huggies</p> <p>20          again. It's the second on the list.</p> <p>21          All right. It says here that the</p> <p>22          source vendor is School Health Corporation.</p> <p>23          Do you see that?</p> <p>24          A. Yes.</p> <p>25          Q. And the manufacturer of this product</p>	<p>101</p> <p>1           All right. So this source vendor</p> <p>2           here is Owens &amp; Minor.</p> <p>3           Do you see that?</p> <p>4           A. Yes.</p> <p>5           Q. And does the manufacturer code P&amp;G</p> <p>6           suggest that it's Procter &amp; Gamble that is the</p> <p>7           manufacturer here?</p> <p>8           A. Yes.</p> <p>9           Q. And the manufacturer for -- you think</p> <p>10          the manufacturer for Huggies would be Kimberly</p> <p>11          Clark?</p> <p>12          A. I don't know, but Huggies is not a</p> <p>13          manufacturer.</p> <p>14          Q. Right, okay.</p> <p>15          Now, let's first -- let's add this to</p> <p>16          the Shopping Cart.</p> <p>17          And let's delete the first item,</p> <p>18          let's delete the Diaper Huggies from the Shopping</p> <p>19          Cart.</p> <p>20          And let's go back to Catalog Search</p> <p>21          again on Find/Shop.</p> <p>22          Yeah, search catalog there.</p> <p>23          Let's search for gown.</p> <p>24          All right. Let's select 10001047,</p> <p>25          Gown Magna 10X.</p>
<p>102</p> <p>1          presumably is Huggies, right?</p> <p>2          A. There's no manufacturer information</p> <p>3          listed for this item.</p> <p>4          Q. Okay. But based on the description,</p> <p>5          Diaper Huggies, would you assume that Huggies is</p> <p>6          the manufacturer here?</p> <p>7          A. Actually, to me, Huggies is a brand</p> <p>8          name and, like, Kimberly Clark would be the</p> <p>9          manufacturer, or something like that.</p> <p>10         Q. Okay. Let's go back to the search</p> <p>11         box up there.</p> <p>12         A. Okay.</p> <p>13         Q. Can you search for two words, like,</p> <p>14         with a bullion search capability here; do you</p> <p>15         know? You can probably put a space -- Huggies,</p> <p>16         space, diapers. It should work. Let's try it.</p> <p>17         Or Huggies Diaper, let's do it that way.</p> <p>18         Okay, so that came up.</p> <p>19         Now, let's add Diaper Huggies to the</p> <p>20         Shopping Cart.</p> <p>21         Okay. Now, let's search again for</p> <p>22         diaper without Huggies in the box.</p> <p>23         And let's scroll down.</p> <p>24         All right. Let's select Diapers baby</p> <p>25         SZ 6. It's 1439010.</p>	<p>104</p> <p>1          Let's go back.</p> <p>2          Let's search for Gown Patient with</p> <p>3          telepocket there.</p> <p>4          A. Do you want me to search or do you</p> <p>5          want me to click --</p> <p>6          Q. Oh, no, no, sorry, click on that item</p> <p>7          there.</p> <p>8          Okay. So the source vendor here is</p> <p>9          Harbor Linen.</p> <p>10         Do you know what the manufacturer</p> <p>11         code HH stands for?</p> <p>12         A. No.</p> <p>13         Q. Okay. Let's --</p> <p>14         A. It may be Harbor Healthcare.</p> <p>15         Q. Okay. So that's a different vendor</p> <p>16         than the vendor we had for the diaper, baby size</p> <p>17         35 pounds and over in the cart?</p> <p>18         A. Yes.</p> <p>19         Q. Okay. Let's add this item to the</p> <p>20         shopping cart.</p> <p>21         And let's select Checkout.</p> <p>22         A. I have a bad account number again.</p> <p>23         Q. All right. Well, let's delete that.</p> <p>24         Let's go back to the search results</p> <p>25         we had for gown.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1     Scroll down, please.</p> <p>2     Let's click gown, surgical, with</p> <p>3     towel, small.</p> <p>4     Okay. So the vendor name here is</p> <p>5     Owens &amp; Minor and the manufacturer, it looks like</p> <p>6     the code stands for Kimberley Clark.</p> <p>7     Do you see that?</p> <p>8     A. I guess that's it.</p> <p>9     Q. Let's add that to the cart.</p> <p>10    And let's check out here.</p> <p>11    Okay. So the order has been</p> <p>12    successfully submitted, Status: Needs Approval.</p> <p>13    Now, is there a way for you to log</p> <p>14    into the system -- or, you know, without logging</p> <p>15    in, as you already are logged in, to approve the</p> <p>16    requisition that was just entered?</p> <p>17    A. I can't approve this requisition as</p> <p>18    logged in.</p> <p>19    Q. You can or can't?</p> <p>20    A. I cannot. This user cannot approve</p> <p>21    their own requisition.</p> <p>22    Q. Okay. And do you know which user of</p> <p>23    the system could approve that requisition?</p> <p>24    A. If it was set up normally, according</p> <p>25    to our true hierarchy, I would think it would be</p>	<p>105</p> <p>1     and --</p> <p>2     A. The approval process is all built in</p> <p>3     process flow, and until it's approved, it doesn't</p> <p>4     actually appear. I don't know, I could try and</p> <p>5     see if this number is there.</p> <p>6     Q. Let's try and see.</p> <p>7     So when you enter RQ10, that's</p> <p>8     opening up requisitions?</p> <p>9     A. Yes.</p> <p>10    Q. Okay. Can you describe for me what</p> <p>11    you're doing now?</p> <p>12    A. Well, I wrote down the requisition</p> <p>13    number and then I tried to bring it up with that</p> <p>14    requester, but this number is not tied to that</p> <p>15    requester, so the number I wrote down for the</p> <p>16    requisition that was approved in req self-service</p> <p>17    is not in Lawson with that same number.</p> <p>18    Q. Could we try to electronically enter</p> <p>19    a requisition within this requisition module?</p> <p>20    A. Sure.</p> <p>21    I was going to just look and see by</p> <p>22    the requester if I could find that requisition.</p> <p>23    Q. Sure. Let's do that first.</p> <p>24    A. I think this is the one we did,</p> <p>25    43299, so when I typed the number in, I probably</p>	<p>107</p>
<p>106</p> <p>1     her director, but I don't see where he's set up as</p> <p>2     a user. This is our test system. We don't have</p> <p>3     everything built in there. I thought when I</p> <p>4     originally logged in as a Lawson user that they</p> <p>5     would have control over everything, so I can try</p> <p>6     that.</p> <p>7     Q. Do you want to try that?</p> <p>8     A. I can try that for you.</p> <p>9     Q. Okay.</p> <p>10    A. It tells me the Lawson requester</p> <p>11    itself does not exist.</p> <p>12    Q. Okay.</p> <p>13    A. So I don't really know who I need to</p> <p>14    log in as to be able to approve this request.</p> <p>15     I can peek through my notes, if you</p> <p>16    don't mind.</p> <p>17     Q. Now, can you approve the requisition</p> <p>18     that's been entered into the system through the</p> <p>19     requisition module instead of the requisition</p> <p>20     self-service module?</p> <p>21     A. I don't think the approvals exist in</p> <p>22     the requisition -- within the Lawson requisition</p> <p>23     model itself.</p> <p>24     Q. You have to go in and enter the</p> <p>25     requisitions first in the requisition module</p>	<p>106</p> <p>1     just typed it wrong.</p> <p>2     Q. Okay.</p> <p>3     A. Okay. So this should be the</p> <p>4     requisition that we generated in the requisition</p> <p>5     self-service that needs approval.</p> <p>6     Q. Okay. Now, could we review that</p> <p>7     requisition here and approve it?</p> <p>8     Like, how do we see what that</p> <p>9     requisition is through this screen?</p> <p>10    A. I would have to release it.</p> <p>11    Q. Okay.</p> <p>12    A. It says it's already been released.</p> <p>13     If I remember correctly, there is a</p> <p>14     way that you can force these through, but it's a</p> <p>15     different screen, it's not on the actual</p> <p>16     requisition screen. The whole intent of the req</p> <p>17     self-service is to make it go through the</p> <p>18     approvals and not release from here until</p> <p>19     everything is there.</p> <p>20    Q. Right.</p> <p>21    A. There should be a way to force it to</p> <p>22    release. I don't know what that is offhand.</p> <p>23    Q. We're almost out of tape here, so</p> <p>24    let's take a break, please.</p> <p>25     VIDEOGRAPHER: This marks the end of</p>	<p>108</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1      Volume 1, Tape No. 2 in the deposition of Lynn      2      Cimino. The time is 1:51.,      3      (Recess.)      4      VIDEOGRAPHER: Back on the record.      5      Here marks the beginning of Volume 1, Tape No. 3      6      in the deposition of Lynn Cimino. The time is      7      1:56.,      8      BY MR. STRAPP:      9      Q. Okay. Ms. Cimino, could you please      10     demonstrate for me, as best as you can, how, using      11     the Lawson System, the current live system      12     available at South Jersey, one would search for an      13     item, electronically request the item through a      14     requisition -- or let's say create the      15     requisition, approve the requisition and then      16     create a purchase order and view the purchase      17     order acknowledgment.      18     A. Not in the live system.      19     Q. Okay.      20     A. In the test system, I can create a      21     requisition and turn it into a PO. There is no      22     acknowledgment to see. We don't take those back      23     into the system.      24     Q. Okay. Could you show us then --      25     demonstrate for us how you would request a</p>	<p>109</p> <p>1      Can you create it in the live version      2      of requisition?      3      A. I don't want to.      4      Q. Because you don't want to have an      5      actual requisition go out and someone is going to      6      go purchase whatever you --      7      A. Correct, especially if you're going      8      to mess with inventory items.      9      Q. Okay. One more request, can you make      10     this requisition of a nonstock item, not an      11     inventory item?      12     A. I can.      13     Q. Okay.      14     A. I mean, I would be willing to show      15     you a requisition in the live system and then try      16     and find the subsequent PO from there and show you      17     all of that in the live system, but I don't want      18     to add it in there.      19     Q. Okay. Why don't we first do it in      20     the test system.      21     A. Okay.      22     Q. And let's make it of an item that's a      23     nonstock item.      24     A. Okay.      25     Q. And, preferably, if you can do it, an</p>
<p>110</p> <p>1      requisition and turn it into a purchase order?      2      A. Okay. Normally, we wouldn't create      3      the requisition in the system like this. If I      4      wanted to just -- I would have my paper req, which      5      get turned directly into a PO. If you want me to      6      try and walk through just creating a requisition,      7      releasing it and making a PO from that, --      8      Q. Correct.      9      A. -- I'll try for you.      10     Q. Okay. And you mentioned this is a      11     test system?      12     A. Yes.      13     Q. Is there any reason that you're using      14     the test system instead of the live system?      15     A. Requisition self-service is not      16     installed in the live system.      17     Q. Okay. When you're going to create      18     the requisition here, are you going to be creating      19     it in requisition self-service or in --      20     A. No.      21     Q. You're going to create it in      22     requisition?      23     A. I was going to create it -- I thought      24     that's what you wanted me to do.      25     Q. Yeah.</p>	<p>110</p> <p>1      item that is available from more than one      2      manufacturer, more than one vendor, like a diaper,      3      for example.      4      A. Okay. So if I'm understanding you      5      correctly, you want me to create a requisition for      6      a diaper, but you also wanted a nonstock?      7      Q. Correct.      8      A. And diapers, for the most part, I      9      think are stock. Okay, well, we'll see what      10     happens.      11     Q. Okay. And as you walk through it,      12     describe for the record, please, each step of the      13     way.      14     A. Okay. So I'm logged into RQ10, which      15     is the base requisition form within Lawson.      16     I'm going to just choose a requester      17     that is already set up in here.      18     I was trying to find one that I      19     thought it would just approve on.      20     I have to indicate which requesting      21     location this is coming to so then I can get the      22     other defaults that come in, like, our purchase      23     from location and company.      24     And here is where I'm actually going      25     to go ahead and pick the items that I want.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Q. Okay.</p> <p>2 A. So these are all my active items in</p> <p>3 here.</p> <p>4 Q. These are nonstock or both stock and</p> <p>5 nonstock?</p> <p>6 A. These are mixed stock and nonstock at</p> <p>7 this point. I'm not sure why, when I drop down,</p> <p>8 it isn't working here. I think that's just a</p> <p>9 problem on the computer.</p> <p>10 I was hoping to be able to search for</p> <p>11 an item by description.</p> <p>12 I'm searching for a description, like</p> <p>13 a diaper, and that's not really recovering good</p> <p>14 results for me.</p> <p>15 Q. Now, that search that you did was a</p> <p>16 search was a search – based on description, you</p> <p>17 wanted to see where the description equaled -- had</p> <p>18 the word diaper in it?</p> <p>19 A. Yes.</p> <p>20 Q. And it pulled up a certain amount of</p> <p>21 items that have that description?</p> <p>22 A. Yes.</p> <p>23 Q. And now you're going to do a</p> <p>24 requisition for one of those items?</p> <p>25 A. Yes.</p>	<p>113</p> <p>1 I'm sorry, you're asking me to walk</p> <p>2 through a process that we don't normally do, so</p> <p>3 I'm a little bit -- I don't want to say I'm</p> <p>4 struggling, but I'm struggling with trying to give</p> <p>5 you what you want here.</p> <p>6 Q. Okay.</p> <p>7 A. What I'm trying to do now is just</p> <p>8 find a valid account number that I can assign to</p> <p>9 this so maybe it will approve, at least take the</p> <p>10 requisition.</p> <p>11 So it's telling me the requisition</p> <p>12 number will be assigned. I'm trying to release</p> <p>13 the requisition. And then it tells me it doesn't</p> <p>14 like my code down here.</p> <p>15 Okay. So now I was able to add a</p> <p>16 requisition. I put in bogus GL account</p> <p>17 information, but that's why we're in test.</p> <p>18 Now it says that it's an unreleased</p> <p>19 requisition.</p> <p>20 So then I would have to release this</p> <p>21 requisition.</p> <p>22 Now it says that it's released, so</p> <p>23 it's been processed.</p> <p>24 Now it should be available to become</p> <p>25 a PO.</p>
<p>114</p> <p>1 I selected one.</p> <p>2 Q. And this is nonstock; how can you</p> <p>3 tell that it's nonstock?</p> <p>4 A. I can't tell that it's nonstock at</p> <p>5 this point.</p> <p>6 Q. But as you go through this process,</p> <p>7 you'll be able to figure out whether it's nonstock</p> <p>8 or inventory?</p> <p>9 A. When it goes into the PO, I'll be</p> <p>10 able to tell if it's nonstock or inventory.</p> <p>11 Q. Okay.</p> <p>12 A. This was a bad item number, because</p> <p>13 this is one that didn't have our account number</p> <p>14 defined.</p> <p>15 Q. So do you want to go back and find</p> <p>16 something else?</p> <p>17 A. I'll go back and search for the</p> <p>18 description equals the diaper again and try and</p> <p>19 pick a better one.</p> <p>20 So it looks like it took this one.</p> <p>21 Q. That means the requisition has been</p> <p>22 built now, it's been created?</p> <p>23 A. It hasn't actually said it's been</p> <p>24 created yet.</p> <p>25 No, it's a bad account number again.</p>	<p>116</p> <p>1 So they do have a PO job that will</p> <p>2 run and find the released requisitions to turn</p> <p>3 them into the purchase orders.</p> <p>4 Q. Is that through PO20, you mentioned?</p> <p>5 A. Well, PO20 would allow me to just</p> <p>6 create this PO from the start. PO100 should</p> <p>7 process any of the unreleased requisitions. I'm</p> <p>8 going to try PO100 and see if I can get your</p> <p>9 requisition in there.</p> <p>10 PO100 doesn't seem to be giving me an</p> <p>11 option that I can pull it based on a specific</p> <p>12 requisition.</p> <p>13 I'm just creating my job to be able</p> <p>14 to run this.</p> <p>15 Q. Okay. Do you have to enter the</p> <p>16 requisition number?</p> <p>17 A. I don't see a spot to enter a</p> <p>18 specific requisition number.</p> <p>19 Q. And the requisition number -- is</p> <p>20 there a requisition number field?</p> <p>21 A. That's what I'm not seeing.</p> <p>22 Normally, when you're creating</p> <p>23 purchase orders, you're running it for everything</p> <p>24 that's there, not for one specific thing, so we're</p> <p>25 structured that, based on the requisitions -- the</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 items that are being requested, they're tied to      2 purchasing agents, companies and they're running      3 this job based on their buyer profile, so whatever      4 is out there for them will get pulled in, so      5 you're asking me to do something that's not really      6 part of our process.</p> <p>7 Q. Can I see how, on your system, a      8 buyer would submit purchase orders to a vendor for      9 nonstock items?</p> <p>10 A. I can't exactly show you that. I can      11 tell you how they would create a purchase order,      12 but then based on the transmission, they may fax      13 it to the vendor, it may go through EDI or they      14 may send a paper copy, so I can't actually show      15 you that.</p> <p>16 Q. Can we see a demonstration of how a      17 buyer would submit a purchase order using EDI?</p> <p>18 A. EDI is not working in the test      19 system.</p> <p>20 Q. Can we go into the live system and      21 see it?</p> <p>22 A. I can show you a PO and walk you      23 through that process, but I will not add one.</p> <p>24 Q. How about if we do it for something      25 that's, like, a cheap \$5 item and I'll spot the</p>	<p>117</p> <p>1 here? I mean, can you click on shopping so I can      2 see -- nothing -- it's not available, or it is      3 available?</p> <p>4 A. No, we don't have all the requesters      5 set up in the live location.</p> <p>6 Q. Okay. Are any requesters set up yet      7 in the live location for requisition self-service?</p> <p>8 A. There's requesters that are set up in      9 the system, but they're not tied to the      10 requisition self-service yet, where it would      11 actively work.</p> <p>12 Q. I see.</p> <p>13 Okay. So we can't create a      14 requisition on the live system using requisition      15 self-service?</p> <p>16 A. Correct.</p> <p>17 Q. So can you create a requisition on      18 the live system for me or is that something that      19 you're unwilling to do or unable do?</p> <p>20 A. That's something I'm unable to do.</p> <p>21 Q. Unable to do, okay.</p> <p>22 A. I can show you a requisition that's      23 on the system, if you'd like to see one?</p> <p>24 Q. Yeah, let's see that.</p> <p>25 A. Okay. So I'm going back to RQ10 and</p>
<p>118</p> <p>1 cash and we can just -- we can have an extra      2 diaper on site or something like that?</p> <p>3 A. No, N-O.</p> <p>4 Q. You can't do that?</p> <p>5 Well, can we go all the way up to the      6 point where it would actually -- can you show me      7 how it would work then, at least on the live      8 system, without actually doing it?</p> <p>9 A. Just inquiring and showing you a PO      10 and then the steps that it would go through?</p> <p>11 Q. Yes, how you would go about      12 purchasing -- submitting a purchase order using      13 EDI on the live system. Show me the steps that      14 you would go through to do that on the live      15 system.</p> <p>16 A. Okay. So I'm going to log out of      17 test and I'm going to log into live.</p> <p>18 Q. So before we go into this, it looks      19 like you have the requisition self-service tab      20 available on the live system?</p> <p>21 A. The tab is here, but not everything      22 has been built and our custom workflow is not      23 here.</p> <p>24 Q. Okay. If someone using the live      25 system clicked on shopping, would anything show up</p>	<p>120</p> <p>1 I'm just picking a requester and bringing up a      2 requisition.</p> <p>3 Q. When it says handheld, does that mean      4 that the requisition was entered through the      5 handheld?</p> <p>6 A. Yes, which our requisitions right      7 now -- any requisition that's generated should be      8 coming from the handheld. Once the requisition      9 self-service module is on, they will also be      10 feeding into requisition self-service.</p> <p>11 Q. Aren't some of the requisitions      12 generated by paper?</p> <p>13 A. Yes, and you shouldn't see them in      14 here. It would be just in POs.</p> <p>15 Q. I see, okay.</p> <p>16 A. That's why I picked a handheld user,      17 because I knew there would be requisitions there.</p> <p>18 Q. Okay.</p> <p>19 A. So I don't know if you want -- what      20 you would like to see on this --</p> <p>21 Q. Let's just see one of the      22 requisitions that is in the system from this      23 particular user?</p> <p>24 A. Okay. Well, here is the main -- the      25 header information for that requisition.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 Q. Okay.</p> <p>2 A. The miscellaneous tab is showing the</p> <p>3 account unit that it's being expensed to.</p> <p>4 Then these are all the lines that are</p> <p>5 on this particular req, the different items that</p> <p>6 they're trying to order.</p> <p>7 Now, here you can see for this</p> <p>8 particular item there's an item type down here of</p> <p>9 I, and that's showing me that this it an inventory</p> <p>10 item.</p> <p>11 Q. Okay. Now, is the manager,</p> <p>12 Mr. DiAngelo, the one who would approve this</p> <p>13 particular requisition?</p> <p>14 A. Requisitions that are coming through</p> <p>15 handhelds right now don't require approvals.</p> <p>16 Q. So he could, himself, approve this</p> <p>17 requisition? I mean, if it doesn't require an</p> <p>18 approval, why is it still pending in the system</p> <p>19 and not --</p> <p>20 A. Well, this one's not. This one is</p> <p>21 actually a closed and processed requisition.</p> <p>22 Q. And when it's closed and processed,</p> <p>23 does that mean the purchase order has already been</p> <p>24 generated?</p> <p>25 A. Yes.</p>	<p>121</p> <p>1 and unreleased, when PO100 would run, it would</p> <p>2 pick up the unreleased requisitions to do whatever</p> <p>3 it needs to do.</p> <p>4 So I can show you -- PO20 is where</p> <p>5 you would create a purchase order.</p> <p>6 I'm going to just pick a number to</p> <p>7 show you that this is what a PO would look like.</p> <p>8 Depending on the defaults that are set up for the</p> <p>9 vendor, it would dictate the transmission method,</p> <p>10 whether it goes out EDI or paper or fax. I know</p> <p>11 the Owens &amp; Minor vendor is set up for EDI.</p> <p>12 Q. Okay. Now, if it's set up for EDI</p> <p>13 and you wanted to submit a purchase order to Owens</p> <p>14 &amp; Minor, what steps would you take to do that?</p> <p>15 A. Once the PO is sitting here, there is</p> <p>16 a PO120 job that runs. That's a mass issue of PO.</p> <p>17 I would run that job putting in my purchase order</p> <p>18 number and then it would take that and it would</p> <p>19 send it out to our carrier, GHX.</p> <p>20 Q. So would you receive a purchase order</p> <p>21 acknowledgment back from Owens &amp; Minor after using</p> <p>22 that PO120 program?</p> <p>23 A. The purchase order acknowledgment</p> <p>24 would go back to GHX and I could view it there.</p> <p>25 We don't take that from GHX back into Lawson.</p>	<p>123</p>
<p>122</p> <p>1 So do you want to see an unreleased</p> <p>2 one or one that's pending?</p> <p>3 These requisitions should be, for the</p> <p>4 most part, all inventory items.</p> <p>5 Q. Okay. Can you create an</p> <p>6 unreleased -- can you create, but not release, a</p> <p>7 requisition for a nonstock item on the live</p> <p>8 system?</p> <p>9 A. No.</p> <p>10 Q. And why not?</p> <p>11 A. Because I don't want to put bad data</p> <p>12 into my production system, no matter how many</p> <p>13 times you ask me.</p> <p>14 Q. I'm sorry, I'm not trying to badger</p> <p>15 you, I'm just trying to understand what we're</p> <p>16 dealing with here.</p> <p>17 So, originally, you had mentioned</p> <p>18 that you would be able to show me on the test</p> <p>19 system how a purchase order is submitted -- or you</p> <p>20 mentioned here you were going to walk me through</p> <p>21 what it would look like to submit a purchase order</p> <p>22 using EDI in the live system, even if you're not</p> <p>23 going to actually do that, so could you show us</p> <p>24 how that would be done?</p> <p>25 A. Okay. So then once the req was here</p>	<p>122</p> <p>1 Q. Could you create, on the system,</p> <p>2 multiple purchase orders from a single</p> <p>3 requisition?</p> <p>4 A. Yes, because the requisition has the</p> <p>5 various items. Depending on who the manufacturer</p> <p>6 or who the vendor for the order is, it gets split</p> <p>7 up on that PO.</p> <p>8 Q. So for example, if, in a requisition,</p> <p>9 you had ordered two items from different vendors,</p> <p>10 two purchase orders would be created, one to each</p> <p>11 vendor?</p> <p>12 A. Yes.</p> <p>13 Q. And you mentioned that the PO</p> <p>14 acknowledgment would go back to GHX.</p> <p>15 GHX, is that the shipping carrier?</p> <p>16 A. GHX is our EDI administrator, our</p> <p>17 intermediary.</p> <p>18 Q. Okay. So EDI is a software program</p> <p>19 that you're licensing from Lawson, but the company</p> <p>20 that's managing it is GHX?</p> <p>21 A. Yeah, we transmit everything through</p> <p>22 GHX.</p> <p>23 Q. I see.</p> <p>24 Is there a way to view purchase</p> <p>25 orders that have been submitted in the system</p>	<p>124</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 here?</p> <p>2 A. Yes.</p> <p>3 Q. Could we see that?</p> <p>4 A. Here is a purchase order that was submitted.</p> <p>5 Q. Okay. And is there a way to determine whether the item that you are attempting to purchase is available in the inventory of the vendor?</p> <p>10 A. I cannot see that here in the system.</p> <p>11 Q. Okay. Earlier, when we went into this requisition system, you did a search where you did description equals diaper.</p> <p>14 A. Yes.</p> <p>15 Q. What other fields are capable of -- can you search in, besides the description field, within the RQ10 requisition program?</p> <p>18 A. Let me go back to RQ10. I think it's going to just make me put in some header information.</p> <p>21 Q. Just hold on for one second there.</p> <p>22 On active items, when you click that drop-down screen there, --</p> <p>24 A. Yes.</p> <p>25 Q. -- do you see it says, items by</p>	<p>125</p> <p>1 What else can you search by?</p> <p>2 A. Well, here, because I don't have everything up, I'm going to have to bring up a requisition that's already here.</p> <p>5 Q. Okay.</p> <p>6 A. I don't know if my computer is just really slow, but it doesn't seem like the drop-downs are working for me.</p> <p>9 So I'm searching -- you can search by item number.</p> <p>11 Q. Okay.</p> <p>12 A. By description.</p> <p>13 Q. And would you be able to see everything else you could search by if that drop down worked?</p> <p>16 A. I'm trying to make this one -- if I back up for you a second.</p> <p>18 Okay, when you come first into this search, it gives you options to search for active items by this requesting location or by a specific location by the product codes, and there's some other ones here, but my scrolling is not working, and I really don't know why.</p> <p>24 Q. Okay.</p> <p>25 A. Once I pick a way -- like, a type</p>
<p>1 universal product code, --</p> <p>2 A. Yes.</p> <p>3 Q. -- items by universal product number?</p> <p>4 A. Yes.</p> <p>5 Q. What are the universal -- what is a universal product code; is that a code that's associated with each item?</p> <p>8 A. That's the UPC code that's on, like, the manufacturer's packaging in the little bar code.</p> <p>11 Q. Right.</p> <p>12 And what's the universal product number; that's the number associated with each --</p> <p>14 A. That's built into that bar code.</p> <p>15 Q. Right.</p> <p>16 Okay. Is there any sort of hierarchy that's used for the universal product numbers to define the type of item that the number is associated with, similar to the way that the UNSPSC code works?</p> <p>21 A. I have no idea.</p> <p>22 Q. Okay. So let's see, again, the search fields that are available here.</p> <p>23 Now, we were talking about -- you can search by description.</p>	<p>126</p> <p>128</p> <p>1 that I want to search by here, so these active items at the From location, then I can also search based on the item number, the description, and, again, I don't know why the drop-downs aren't working to tell you what else is under here.</p> <p>6 I was able to hit D, because I knew description was there. It must be a problem with my laptop, to be honest with you, because I don't have a problem on my desktop.</p> <p>10 Q. So you can first do a search for particular matching items by location or by universal product number or universal code.</p> <p>13 A. Uh-huh.</p> <p>14 Q. And then you can also -- well, let me start over.</p> <p>16 You can first select the particular items that you want to search using one of those methods there. And then you can search among whatever you've selected by using, you know, a description word or by using text that matches up with --</p> <p>22 A. Yes. So you're first picking, how do you want to search, you know, by some fields. I'm searching by items that are reacted by a certain location. Then within those items that fit that</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 initial qualification, am I searching for item      2 number, description or something else.      3 Q. In that original drop-down menu      4 there, do you know if one of the ways that you can      5 search is by searching for manufacturer names or      6 vendor names?      7 A. There's a manufacturer code search,      8 there's a manufacturer number search.      9 Q. Okay. So you can do it -- you can      10 first do a search by manufacturer number --      11 A. Manufacturer code or number.      12 Q. -- or manufacturer code for a vendor      13 item search?      14 And then once you've done that      15 search, you can search for matching items among      16 that manufacturer code?      17 A. Right.      18 So now that I've picked by the      19 manufacturer code, this screen shows me the      20 manufacturer's information that's now available      21 for me to limit my search on.      22 Q. Okay.      23 A. Depending on the first item I pick,      24 you get different results to then be able to      25 search further by.</p>	<p>129</p> <p>1 here?      2 A. No, we're -- well, where we started      3 was on the requisition creation, so I'm in here      4 physically creating this requisition, searching      5 for the stuff I want to put on it.      6 Q. Okay. So if we selected something      7 here, that could be added to the requisition?      8 A. Yes. If I selected something here,      9 it would pull it into that next line.      10 Q. Okay. So it looks like there's      11 multiple manufacturer codes here under code; do      12 you see that, ABT, ADDT?      13 A. Yes.      14 Q. And is that showing every      15 manufacturer code that's in the system; if you      16 scroll down, would it --      17 A. It should be, yes.      18 Q. Okay. Is there a way to limit it to      19 only a particular manufacturer code or codes      20 instead of showing every manufacturer code?      21 A. If I went in here and searched by      22 code -- again, I apologize because the background      23 is not working. I'm hitting C to think that it      24 would let me search by code. C is not resulting      25 anything for me.</p>
<p>130</p> <p>1 Q. Okay. Can we try to do that?      2 A. I selected by manufacturer code      3 already.      4 Q. Okay. And now that we've selected by      5 manufacturer code, can we search for, let's say, a      6 particular description of an item in that code?      7 A. It doesn't look like it's going to      8 let me search further by the description. This      9 drop-down doesn't work. I'm typing D, hoping it      10 will move. It went to division, but it's not      11 moving any further to get to description.      12 Q. Could we use another --      13 A. Item description, okay.      14 Q. Okay. So now let's search for      15 C-A-T-H, catheter, maybe.      16 Okay. So now we're seeing here      17 matching items among -- items that match up with      18 the C-A-T-H description among the manufacturers      19 that you've chosen here, searching by      20 manufacturer?      21 A. Right.      22 Q. Okay. Now, once you select a      23 particular item within this list here, is there a      24 way to electronically create the requisition for      25 that item; is that what we've already gone through</p>	<p>130</p> <p>132</p> <p>1 Q. Okay. But you should be able to      2 search by manufacturer code here, and that would      3 limit it to the manufacturer's codes who match up      4 with whatever code you entered?      5 MR. GRAHAM: Objection; speculation.      6 A. I don't know. I'm typing C, thinking      7 code would come up. It's not. So I want to say,      8 no, I can't search at this point just by code.      9 MR. CLEMENTS: Could you try an      10 asterisk? Because I think I remember it was an      11 asterisk, then code under that field.      12 THE WITNESS: Okay.      13 A. So if I said just A-N-G-I, which came      14 up first?      15 Q. Right.      16 A. So, yes, now I'm getting just that      17 code.      18 Q. So now that you've done that search,      19 you have selected items that come from a      20 particular manufacturer, correct?      21 A. Yes.      22 Q. And now that you've limited your      23 search result to those items that come from a      24 particular manufacturer, you can do a further      25 narrowing search within those items for a</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 particular item description? Like, for example, 2 you could go into this search result and search 3 for C-A-T-H; is that possible? 4 A. I can do a multi-step search. 5 Q. Okay. 6 A. So here, where I have code equals the 7 A-N-G-I, I can add something and say, so where the 8 code equals this and -- 9 Q. The description item? 10 A. -- the item's description -- 11 Q. Equals C-A-T-H? 12 A. Well, I'm going to say like C-A-T-H. 13 Q. Okay. 14 A. So now I'm limiting that to just the 15 manufacturer code A-N-G-I with CATH and a 16 description. 17 Q. Okay. If we now go back and do 18 another search here for item description equals -- 19 or like CATH, but we take out the first step in 20 the search here -- 21 A. Item description like CATH, now I 22 should have all items with a description of CATH 23 in there, regardless of who the manufacturer code 24 is. 25 Q. Okay. So now we could go in and</p>	<p>133</p> <p>1 MR. STRAPP: Let's go off the record 2 for a minute. 3 VIDEOGRAPHER: Going off the record 4 at 2:42., 5 (Recess.) 6 VIDEOGRAPHER: Back on the record at 7 2:44., 8 BY MR. STRAPP: 9 Q. Okay. Now that we have the item 10 description up and we're searching for diaper, can 11 you run that search, please? 12 Let's select Diapers Huggies, please. 13 A. Well, if I select it, it's going to 14 try and put it in my requisition. 15 Q. Can we do that; is that possible? 16 A. No. 17 MS. BURKE-ANDERSON: I think maybe 18 you need to ask the question, what can you do 19 without creating a requisition, because that's, I 20 think, where we're getting... 21 Q. Okay. So what can you do to show me 22 what the Diapers Huggies item would have without 23 actually creating the requisition on your live 24 system? 25 A. You want to see the Item Master</p>
<p>134</p> <p>1 select something with the item description CATH 2 that comes from a manufacturer other than A-N-G-I, 3 correct? 4 A. Yes. 5 Q. And once we did that, we could then 6 create the requisition, approve it, submit the 7 purchase order? 8 A. Yes. 9 MR. STRAPP: Why don't we take a 10 short break. 11 VIDEOGRAPHER: Going off the record. 12 The time is 2:31., 13 (Recess.) 14 VIDEOGRAPHER: Back on the record. 15 The time is 2:41., 16 BY MR. STRAPP: 17 Q. Could we go into the requisition 18 module that you already have up on the screen and 19 do a search by item description? 20 A. What description? 21 Q. Diapers again. 22 MR. CLEMENTS: Could you stop for 23 just a moment? Sorry, it looks like the host has 24 been switched back to Kevin again, so I'm not 25 getting your screen anymore.</p>	<p>136</p> <p>1 set-up for the Diapers Huggies? 2 Q. Yes, let's see that. 3 A. I can show you that. 4 I'm just going to write this item 5 number down. 6 Q. And let me ask you one more question, 7 if we went into the test system, would you be able 8 to do what you're doing here on the live system 9 and actually create the requisition the same way 10 that you're doing it here -- showing me how it 11 could be done here? 12 A. Well, we tried that once and it 13 didn't work out too well. I can go back and try 14 again, but if you're wanting to see what the 15 information is about the item, let me show you the 16 Item Master record, see if that answers your 17 question; if not, I'll go back into test and try 18 and make one for you. 19 Q. Okay. 20 A. So IC11 is our Item Master set-up. 21 Now, here, like I could do on the 22 other screen, I can search by item. So this is 23 the same search that we just had. And I'll go 24 back and I'll look for the description, like diaper.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 I now select that same one, Huggies</p> <p>2 Diaper.</p> <p>3 Q. Okay.</p> <p>4 A. And if I inquire, now this is the</p> <p>5 information I have set up in the Item Master for</p> <p>6 that particular item.</p> <p>7 Q. Does it have a vendor name in here?</p> <p>8 A. In this screen set-up, you don't tie</p> <p>9 this item to the vendor. If I drill around on</p> <p>10 this item, I can probably see the vendor that it's</p> <p>11 tied to.</p> <p>12 Here I have PO vendor items and I can</p> <p>13 see that it's tied to this vendor, School Health</p> <p>14 Corporation.</p> <p>15 Q. Okay. Now, can we go back to the</p> <p>16 result that gave us a list of items with diaper as</p> <p>17 the description?</p> <p>18 A. Okay. So that's the list.</p> <p>19 Q. And let's select Diapers Goodnites</p> <p>20 use -- yeah, 1439006.</p> <p>21 A. Okay.</p> <p>22 Q. Okay. The manufacturer name here is</p> <p>23 Kimberly Clark.</p> <p>24 Can we drill around to see additional</p> <p>25 vendor name information?</p>	<p>137</p> <p>1 Q. Right.</p> <p>2 A. -- and secondary by description?</p> <p>3 Q. Well, let's just do a search first</p> <p>4 by --</p> <p>5 A. The code?</p> <p>6 Q. -- the code.</p> <p>7 A. What code?</p> <p>8 Q. Let's use -- is P&amp;G a code, do you</p> <p>9 know? Do you want to try it and see if it works?</p> <p>10 A. I think it was just PG.</p> <p>11 Q. Just PG.</p> <p>12 A. No.</p> <p>13 Q. Let's try -- is it P&amp;G?</p> <p>14 A. No, I did P asterisk. I can go back</p> <p>15 and do the P&amp;G, if you want, specifically.</p> <p>16 Q. I want to see whether there's any --</p> <p>17 what I'm looking for here is whether there's any</p> <p>18 items in here that are exactly the same item from</p> <p>19 the same manufacturer, but available from two</p> <p>20 vendors or more than two vendors; in other words,</p> <p>21 is there, for example, diapers from Procter &amp;</p> <p>22 Gamble -- the same sized diaper carried by two</p> <p>23 different vendors here?</p> <p>24 It doesn't look like there is here,</p> <p>25 at least for Procter &amp; Gamble. It looks like</p>
<p>1 A. Here, this item is tied to Owens &amp;</p> <p>2 Minor.</p> <p>3 Q. Okay. Now, let's go back to the</p> <p>4 requisition module that you had open a few minutes</p> <p>5 ago.</p> <p>6 Can you do a search by manufacturer</p> <p>7 code?</p> <p>8 A. I'm not sure what you're wanting me</p> <p>9 to look at. I don't know if this is the right</p> <p>10 place to look for it.</p> <p>11 Q. I want you to -- let's say, pull up</p> <p>12 all items that include Procter &amp; Gamble as the</p> <p>13 manufacturer.</p> <p>14 A. Okay. So I want to go back to the IC</p> <p>15 set-up, and here are my items.</p> <p>16 You want me to search by</p> <p>17 manufacturer, and here I can't search by</p> <p>18 manufacturer.</p> <p>19 Q. So could we try to do it through the</p> <p>20 requisition?</p> <p>21 A. Uh-huh.</p> <p>22 You said manufacturer name?</p> <p>23 Q. Let's do manufacturer code.</p> <p>24 A. Okay. Primary search by manufacturer</p> <p>25 code --</p>	<p>138</p> <p>1 they're each different ones, but maybe if we do a</p> <p>2 different -- search by different -- maybe if we do</p> <p>3 a search by all manufacturer codes and just scroll</p> <p>4 down and see whether any of the item descriptions</p> <p>5 are identical, but yet have the same manufacturer</p> <p>6 code, that could sort of show us if you're</p> <p>7 carrying the same product by the same</p> <p>8 manufacturer, but you're just carrying it from two</p> <p>9 different vendors.</p> <p>10 So let's just take out the P asterisk</p> <p>11 there and sort it by manufacturer code, just all</p> <p>12 active items by manufacturer code.</p> <p>13 A. Okay, so this is all items by</p> <p>14 manufacturer code.</p> <p>15 Q. Okay. But isn't this just limited to</p> <p>16 the P asterisk?</p> <p>17 A. So now we're back to this.</p> <p>18 Q. Okay. So -- like, for example, it</p> <p>19 looks like the item description for -- well, those</p> <p>20 are all slightly different, but I'm wondering if</p> <p>21 any of these item descriptions are identical.</p> <p>22 Can we scroll down here and see the</p> <p>23 next down at the bottom there.</p> <p>24 All right. Let's keep on scrolling.</p> <p>25 This might be a feudal search here, but just a</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 little further.</p> <p>2 All right. Let's call a halt to</p> <p>3 this.</p> <p>4 MR. STRAPP: Can we take a break for</p> <p>5 just a couple of minutes, please?</p> <p>6 VIDEOGRAPHER: Going off the record</p> <p>7 at 2:53.,</p> <p>8 (Recess.)</p> <p>9 VIDEOGRAPHER: Back on the record at</p> <p>10 2:53.,</p> <p>11 BY MR. STRAPP:</p> <p>12 Q. Ms. Cimino, thank you for your time</p> <p>13 and cooperation and assistance. I appreciate it.</p> <p>14 We have no further questions at this time.</p> <p>15 MR. GRAHAM: I just have a few</p> <p>16 questions. I'll try to keep it brief.</p> <p>17 EXAMINATION BY MR. GRAHAM:</p> <p>18 Q. Can we -- so looking at the screen</p> <p>19 we're at right here, this is RQ10.</p> <p>20 Can you click on the search button.</p> <p>21 And this is the search that we've</p> <p>22 been using today?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. So when you add -- when you</p> <p>25 hit the plus sign over on the right side, that</p>	<p>141</p> <p>1 Q. And can you hit the add?</p> <p>2 A. To add the other search lines?</p> <p>3 Q. Yeah, I think so.</p> <p>4 A. Okay.</p> <p>5 Q. And then do an item description.</p> <p>6 And diaper, we've been using that</p> <p>7 one.</p> <p>8 Okay. Now, this time, when you click</p> <p>9 filter, it's still going to look through all the</p> <p>10 active items, but now it's going to search for two</p> <p>11 criteria?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. So it's still searching all</p> <p>14 the active items in the Item Master?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. It's not just searching the</p> <p>17 ones that popped up on P&amp;G, it's still searching</p> <p>18 the entire Item Master?</p> <p>19 A. As far as I know. I mean, it should.</p> <p>20 Q. Thank you.</p> <p>21 Now, South Jersey upgraded its Lawson</p> <p>22 System in April of 2008?</p> <p>23 A. April of 2008 is when we signed the</p> <p>24 contracts.</p> <p>25 Q. Okay. And you had an existing system</p>
<p>1 adds an additional level -- an additional criteria</p> <p>2 to filter through, right?</p> <p>3 A. Yes, additional search options.</p> <p>4 Q. Now, can you subtract that one?</p> <p>5 And go head and put in P&amp;G in there,</p> <p>6 So these are all the items from the</p> <p>7 Item Master that have the P&amp;G code; is that</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. And when you did this search, do you</p> <p>11 know if it went through the entire -- searched the</p> <p>12 entire Item Master to find these results?</p> <p>13 A. It was searching active items in the</p> <p>14 Item Master.</p> <p>15 Q. And what are active items versus</p> <p>16 nonactive items?</p> <p>17 A. In our Item Master, we can designate</p> <p>18 that this is an active item or an inactive item.</p> <p>19 So if we had it in there and we don't intend to</p> <p>20 use it, we would make it inactive.</p> <p>21 Q. Okay. So this would be all the</p> <p>22 active items that have the P&amp;G code next to it?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Can you click on search again?</p> <p>25 A. Yes.</p>	<p>142</p> <p>1 at that time -- an existing Lawson System at that</p> <p>2 time?</p> <p>3 A. For materials only, yes.</p> <p>4 Q. And materials would be the</p> <p>5 procurement?</p> <p>6 A. Procurement, inventory.</p> <p>7 Q. Do you recall when you originally</p> <p>8 licensed that older system?</p> <p>9 A. No. I mean, we've had that for</p> <p>10 years.</p> <p>11 Q. Would it be before 1995?</p> <p>12 A. I think yes.</p> <p>13 Q. Now, walking through the installation</p> <p>14 a little bit, you testified that the actual</p> <p>15 installation of the upgrade was done by a third</p> <p>16 party vendor?</p> <p>17 A. Yes.</p> <p>18 Q. Blue Horseshoe; is that correct?</p> <p>19 A. Blue Horseshoe.</p> <p>20 Q. After Blue Horseshoe had installed</p> <p>21 the system, were there any items in the Item</p> <p>22 Master of the upgraded system?</p> <p>23 A. From the brand new install?</p> <p>24 Q. Yes.</p> <p>25 A. No.</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1       Q.    Okay. And did Blue Horseshoe also 2       help you install requisition self-service? 3       A.    Yes, I believe so. 4       Q.    And then another non-Lawson 5       consultant helped you to customize it? 6       A.    Yes. 7       Q.    To get the work flow customization? 8       A.    Yes. 9       Q.    Now, you testified that each year 10      South Jersey has to pay a maintenance fee; is that 11      correct? 12      A.    Yes. 13      Q.    Do you also have to pay a license 14      fee? 15      A.    No. 16      Q.    So if you stopped paying the 17      maintenance fee, you could still continue using 18      the system as it stands? 19      A.    That's my understanding. 20      Q.    And then you also have paid for 21      services from Lawson? 22      A.    We had, yes. 23      Q.    And you testified that you used 24      service tickets; is that right? 25      How do you request services from</p>	<p>145</p> <p>1       Q.    Is that different than the service 2       ticket? 3       A.    No, that's kind of how they work the 4       service ticket. 5       Q.    Okay. And that would be the same for 6       the WebEx sessions? 7       A.    Yes. You would initiate the request 8       initially and it would go interactive and then 9       there may be a phone call or there may be a WebEx 10      session to walk through the problem you're having. 11      Q.    So those are ways to correct the 12      problem you're having or help you walk through it? 13      A.    Yeah, or to get support. 14      Q.    Can you take a look at Exhibit South 15      Jersey 4? 16      MR. STRAPP: Josh, I don't mean to 17      interrupt, but if you're done with the 18      demonstration, we can close out. 19      Q.    Let's hold on to that, South Jersey 20      4, for a second. 21      I have just a couple more questions 22      on this. 23      Can you log back into the Requisition 24      Self-Service site, go out of production into the 25      test.</p>
<p>146</p> <p>1       Lawson? 2       A.    Well, the tickets I think you're 3       referring to are, when we have problems, we put a 4       support ticket in for assistance. If I want to 5       purchase additional services, I would contact my 6       account manager and ask for a quote. 7       Q.    How many of those specific service 8       tickets do you put in on a new system? 9       A.    How many? 10      Q.    Yes. 11      A.    A few hundred. 12      Q.    A few hundred. 13      Do you -- and that would include not 14      only the procurement side, but also the human 15      resources and the financial? 16      A.    Yes. 17      Q.    Do you know approximately what 18      percent were related to the procurement? 19      A.    Not offhand. 20      Q.    Would it be significantly more or 21      less than from human resources or financial? 22      A.    I wouldn't hedge a guess. 23      Q.    And you also testified that you had 24      some interactive web support? 25      A.    Yes.</p>	<p>148</p> <p>1       Okay. Can you do the Find/Shop, 2       Search Catalog and do a search for Lotion. 3       Can you add 1424153. 4       And also add 1030 -- yes, that one 5       right there. That would be Item No. 1030363. 6       From the description you see on my 7       cart, the description of each item -- 8       (Interrupt.) 9       VIDEOGRAPHER: Going off the record 10      at 3:01., 11      (Off the record.) 12      VIDEOGRAPHER: Back on the record at 13      3:02., 14      BY MR. GRAHAM: 15      Q.    Pardon the interruption. 16      From the description under My Cart 17      for each of the items, is there any way to tell 18      what this lotion is used for? 19      A.    Well, looking at cleansing, I would 20      think that that would be more of a cleaning-type 21      lotion compared to just a regular hand and body 22      lotion, but to know what it's truly used for, no. 23      Q.    So from these descriptions, you can't 24      tell if one could be switched for the other one to 25      an enduser?</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 A. To a nonclinical enduser, no.</p> <p>2 Q. Okay. You can -- can you delete</p> <p>3 those.</p> <p>4 And can you do a search for diaper.</p> <p>5 And can you add number 1430969.</p> <p>6 And can you also add 1439010.</p> <p>7 A. Okay.</p> <p>8 Q. So, again, from the description here,</p> <p>9 you wouldn't be able to tell if these diapers were</p> <p>10 the same size?</p> <p>11 A. Not from the description.</p> <p>12 Q. Okay. So there's no indication that</p> <p>13 one can be used as a replacement for the other?</p> <p>14 A. The fact that one doesn't say what</p> <p>15 size it is and one does would lead me to believe</p> <p>16 that they couldn't be interchanged, but, no, I</p> <p>17 couldn't be sure of that.</p> <p>18 Q. Thank you.</p> <p>19 MR. GRAHAM: I'm done with the --</p> <p>20 MR. STRAPP: Okay. Do you want to go</p> <p>21 off the record for a minute and just close it</p> <p>22 down?</p> <p>23 MR. GRAHAM: Sure. Let's go off the</p> <p>24 record and close it down.</p> <p>25 VIDEOGRAPHER: Going off the record</p>	<p>149</p> <p>1 A. Correct.</p> <p>2 Q. And why doesn't it use those</p> <p>3 functions?</p> <p>4 A. I think that's our discussion -- our</p> <p>5 issue here. We don't want to have multiple item</p> <p>6 numbers for the same item.</p> <p>7 Q. And why not?</p> <p>8 A. I couldn't speak to that logic. I</p> <p>9 disagree with it personally, so...</p> <p>10 Q. There were also some questions about</p> <p>11 the ability of the Lawson System to associate one</p> <p>12 item in the Item Master with multiple vendors?</p> <p>13 A. Yes.</p> <p>14 Q. Does South Jersey actually do that?</p> <p>15 A. Yes.</p> <p>16 Q. And how does it decide which items to</p> <p>17 associate with multiple vendors?</p> <p>18 A. I guess whoever we have contracts</p> <p>19 with to get that item.</p> <p>20 Q. And then one of those vendors would</p> <p>21 be a default vendor?</p> <p>22 A. I would say yes, although I don't</p> <p>23 recall seeing any default order where you assign</p> <p>24 the vendors to the item.</p> <p>25 Q. Now, discussing the purchase order</p>
<p>1 at 3:04.,</p> <p>2 (Off the record.)</p> <p>3 VIDEOGRAPHER: Back on the record at</p> <p>4 3:06.,</p> <p>5 BY MR. GRAHAM:</p> <p>6 Q. I had a couple of questions about the</p> <p>7 ORMis System.</p> <p>8 And that interfaces with the Lawson</p> <p>9 System; is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. I believe you testified that certain</p> <p>12 parts of the Item Master are sent over to ORMis?</p> <p>13 A. Yes.</p> <p>14 Q. What does ORMis do with those items?</p> <p>15 A. They take the item number and the</p> <p>16 cost information to go with it for billing for the</p> <p>17 patient, the cases that they're using those items</p> <p>18 in, to be able to bill for it.</p> <p>19 Q. What does ORMis send back to Lawson?</p> <p>20 A. Nothing.</p> <p>21 Q. A few questions about the substitute</p> <p>22 replacement items.</p> <p>23 You testified that South Jersey does</p> <p>24 not use the substitute replacement in inventory</p> <p>25 control?</p>	<p>150</p> <p>1 process a little bit, you testified when a</p> <p>2 purchase order goes out, that South Jersey -- a</p> <p>3 purchase order for a nonstock item goes out to a</p> <p>4 vendor, the vendor will send a confirmation back</p> <p>5 to South Jersey?</p> <p>6 A. Yes.</p> <p>7 Q. And that confirmation is not put into</p> <p>8 the Lawson System?</p> <p>9 A. Correct.</p> <p>10 Q. So there's no way in the Lawson</p> <p>11 System to determine whether or not South Jersey</p> <p>12 has received a confirmation?</p> <p>13 A. Correct.</p> <p>14 Q. Thank you, Ms. Cimino. That's all my</p> <p>15 questions.</p> <p>16 MR. STRAPP: I just have a couple</p> <p>17 more questions.</p> <p>18 FURTHER EXAMINATION BY MR. STRAPP:</p> <p>19 Q. Ms. Cimino, you just testified that</p> <p>20 South Jersey does have, in its Item Master,</p> <p>21 particular items that have multiple vendors?</p> <p>22 A. Yes.</p> <p>23 Q. So, for example, you might have,</p> <p>24 let's say, for example, the diaper size 6 from</p> <p>25 Huggies that's available from one vendor and also</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1 available from a second vendor, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Now, is it possible, then, to do a</p> <p>4 search in the requisition module that we were</p> <p>5 looking at, whereby you search for diapers, you</p> <p>6 pull up the Huggies diaper, size 6, and then you</p> <p>7 can select it from the first vendor and request</p> <p>8 a -- and create a requisition and then select it</p> <p>9 from the second vendor and create a requisition</p> <p>10 also from that second vendor?</p> <p>11 A. When we're selecting the item to the</p> <p>12 requisition, it's defaulting to a vendor. In that</p> <p>13 case, I don't believe we had multiple vendors tied</p> <p>14 to it, so we have to really pick the item that had</p> <p>15 the multiple vendors. I don't know which one</p> <p>16 would default in that case.</p> <p>17 Q. But if you had an item with multiple</p> <p>18 vendors, which you said you did, --</p> <p>19 A. Yes.</p> <p>20 Q. -- and you found that item in the</p> <p>21 Item Master, --</p> <p>22 A. Yes.</p> <p>23 Q. -- you could select -- create a</p> <p>24 requisition from the first vendor and then you</p> <p>25 could create a requisition from the second vendor</p>	<p>153</p> <p>1 Cimino. The time is 3:13. Going off the record.</p> <p>2 (The following statement was made off</p> <p>3 the video record.)</p> <p>4 MR. STRAPP: I'd like to note on the</p> <p>5 record that the demonstration provided today by</p> <p>6 Ms. Cimino of the Lawson System was recorded and</p> <p>7 that the recording of that demonstration will be</p> <p>8 marked as Exhibit 11, South Jersey Exhibit 11 to</p> <p>9 this deposition.</p> <p>10 (Exhibit South Jersey 11 was received</p> <p>11 and marked for identification and retained in the</p> <p>12 computer by Mr. Clements.)</p> <p>13 (TIME NOTED: 3:14 p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>1 for the same item, correct?</p> <p>2 A. Yes. One would default. I would</p> <p>3 have to override it to the second. But could I</p> <p>4 order ultimately from both vendors, yes.</p> <p>5 MR. STRAPP: I have no further</p> <p>6 questions.</p> <p>7 MR. GRAHAM: Just one follow-up</p> <p>8 question, sorry.</p> <p>9 FURTHER EXAMINATION BY MR. GRAHAM:</p> <p>10 Q. Is there a way to determine, in the</p> <p>11 system, which items have multiple vendors attached</p> <p>12 to them by doing a search?</p> <p>13 A. Not that I can think of.</p> <p>14 Q. So I would have to know -- how would</p> <p>15 you know which item had two vendors in order to do</p> <p>16 the situation that Mr. Strapp suggested?</p> <p>17 A. I could find it other ways, but not</p> <p>18 through the Lawson search. I mean, I could query</p> <p>19 the database directly looking for certain codes or</p> <p>20 multiple records and come back to that, so I</p> <p>21 wouldn't necessarily have to, but as an end user,</p> <p>22 yeah, I would kind of have to know.</p> <p>23 Q. Thank you.</p> <p>24 VIDEOGRAPHER: This concludes the</p> <p>25 deposition, Volume 1, Videotape No. 3, of Lynn</p>	<p>154</p> <p>1 WITNESS'S CERTIFICATION</p> <p>2</p> <p>3 _____</p> <p>4 LYNN S. CIMINO</p> <p>5</p> <p>6 On _____, 2010, the foregoing</p> <p>7 deposition was submitted to LYNN S. CIMINO, the</p> <p>8 witness, taken on Tuesday, March 2, 2010, for her</p> <p>9 examination.</p> <p>10 At which time the deposition was read by the</p> <p>11 witness and any proposed changes desired were</p> <p>12 subsequently entered upon the attached errata</p> <p>13 sheet.</p> <p>14 Thereafter, the deposition was duly witnessed</p> <p>15 and signed by:</p> <p>16</p> <p>17 _____</p> <p>18 Notary Public in and for the</p> <p>19 County of _____</p> <p>20 State of _____</p> <p>21</p> <p>22</p> <p>23</p> <p>24 _____</p> <p>25 My Commission Expires</p>

Cimino, Lynn - South Jersey 3/2/2010 12:00:00 AM

<p>1           ERRATA SHEET 2 3       WITNESS'S NAME _____ 4       DATE OF DEPOSITION _____ 5       CASE NAME _____ 6 7       PAGE LINE CORRECTION 8       _____ 9       _____ 10      _____ 11      _____ 12      _____ 13      _____ 14      _____ 15      _____ 16      _____ 17      _____ 18      _____ 19      _____ 20      _____ 21      _____ 22      _____ 23      _____ 24      _____ 25      _____</p>	157
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	158
<p>1           C E R T I F I C A T E 2       I, ELIZABETH M. KONDOR, a Certified Court 3       Reporter, No. 30X100117200, Certified LiveNote 4       Reporter, No. 060907-14 and Notary Public of the 5       State of New Jersey, do hereby certify that prior 6       to the commencement of the examination, LYNN S. 7       CIMINO was duly sworn by me to testify the truth, 8       the whole truth and nothing but the truth. 9       I DO FURTHER CERTIFY that the foregoing 10      is a true and accurate transcript of the testimony 11      as taken stenographically by and before me at the 12      time, place and on the date hereinbefore set 13      forth. 14       I DO FURTHER CERTIFY that I am neither a 15      relative nor employee nor attorney nor counsel of 16      any of the parties to this action, and that I am 17      neither a relative nor employee of such attorney 18      or counsel, and that I am not financially 19      interested in the action. 20 21 22      _____ 23      Notary Public of the State of New Jersey 24      My Commission expires June 6, 2010. 25      Dated: Tuesday, March 9, 2010</p>	158

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of August, 2010, I will electronically file the foregoing

**PLAINTIFF ePLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER  
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND  
REVISED SUMMARY OF THE DEPOSITION OF LYNN S. CIMINO**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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